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BEFORE THE ARIZONA CORPORATION COMMISSION

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IN THE MATTER OF THE
INVESTIGATION INTO
US WEST COMMUNICATION,
INC.'S COMPLIANCE WITH
THE § 271 OF THE
TELECOMMUNICATIONS ACT
OF 1996

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DOCKET NO. T-00000A-97-0238

**COVAD COMMUNICATIONS COMPANY'S SUPPLEMENTAL BRIEF ON
QWEST CORPORATION'S CHANGE MANAGEMENT PROCESS**

Covad Communications Company ("Covad") respectfully submits this
Supplemental Brief on Qwest Corporation's ("Qwest") Change Management Process.

I. INTRODUCTION

An effective change management process ("CMP") – pursuant to which Qwest communicates to CLECs system, process and product changes -- is an integral component of competitors' ability to compete in a meaningful manner with Qwest.¹ In the absence of an adequate change management process, Qwest can impose substantial and anti-competitive costs and burdens on competitors by making changes to its products,

¹ *In the Matter of Application of Verizon Pennsylvania, Inc., Verizon Long Distance, Verizon Enterprise Solutions, Verizon Global Networks Inc. and Verizon Select Services Inc. for Authorization to Provide In-Region, Inter LATA Services in Pennsylvania*, CC Docket No. 01-138, App. C, ¶ 41 (Sept. 19, 2001) ("Verizon Pennsylvania 271 Order").

processes, services and systems without providing CLECs with adequate notice, opportunity to provide input, testing and documentation.² It is precisely because of these concerns about Qwest's ability to hinder and harm competition in the absence of an effective and procedurally sound change management process that the "CMP redesign" effort was undertaken.

As set forth more fully in Covad's Brief on Qwest Corporation's ("Qwest") Change Management Process, filed on January 18, 2002, this Supplemental Brief, and in AT&T's and WCom's briefs on CMP, the CMP continues to be subject to additional challenges by CLECs and is replete with procedural, process and documentation deficiencies demonstrating that Qwest has not established an adequate plan to control change. Covad will not repeat the facts and argument laid out in its January 18, 2002 Brief, but rather incorporates them as if fully set forth herein. Covad provides in this Supplemental Brief only additional information obtained since January 18, 2002 regarding CMP that will permit the Commission to make a thorough and complete review of the current status of CMP, and responses to Qwest's Brief Regarding Change Management ("Qwest Brief").

II. ARGUMENT

A. **Qwest Has Not Resolved the Issues Associated with Production Support, Which Is an Integral Component of an Efficient Systems CMP.**

In its Brief, Qwest suggests that it has a fully functional production support process in place and thus has an effective and complete systems CMP to the extent it addresses production support. *See* Qwest Brief, p. 9. "Production support" is the phrase used to describe the changes that are implemented by Qwest to correct defects in a production version(s) of an OSS upgrade or release (which occurs regularly each year).

² *SBC Texas 271 Order*, ¶107.

The defects in the OSS release can include interrupted connectivity, failed transactions, system crashes, degraded performance, data corruption, memory leaks, and/or functionality not coded to specification. Thus, production support plays a critical role in ensuring that the transition from one OSS version to the next is seamless and does not negatively impact a CLEC's ability to do business (all of which, of course, Qwest is free from since it does not utilize the same OSS/gateways as CLECs do).

Contrary to the rosy impression conveyed by Qwest, there are numerous issues that undermine the reliability of Qwest's production support process. More specifically, according to KPMG, the third party OSS tester for the thirteen ROC states, "Qwest has not implemented a comprehensive and fully documented production support process to address changes that correct failures in the production version(s) of OSS interfaces." *See* KPMG Exception 3112, attached hereto as *Exhibit 1*.³ Indeed, KPMG identified numerous deficiencies, such as, *inter alia*, the lack of any (1) identified and verified procedure for production support; (2) evaluation, categorization and prioritization of production support procedures; (3) internal and external communication procedures where production support is required; (4) escalation procedures; (5) testing procedures; (6) documentation of management procedures; and (7) training procedures. Thus, the deficiencies identified by KPMG are precisely the types of documentation and procedures that must be in place in order for even a minimally adequate production support process.

While Qwest has provided documentation to address some, but not all, of the specific issues identified by KPMG in Exception 3112, KPMG has not yet reached any conclusion that Qwest has corrected the serious deficiencies it identified. Moreover, Qwest has failed thus far to provide any documentation showing that it has in place a

³ For all Observations and Exceptions referenced as Exhibits to this Brief, Covad attaches only the most recent version contained in the O&E log since there can be several responses to the initial report by both Qwest and the party (KPMG, HP or Liberty) opening the observation or exception.

documented management procedure for production support or that it has ever trained any of its employees as to the production support process needs, requirements and deliverables. Consequently, there are still substantial problems with Qwest's production support process that must be corrected before Section 271 approval may be given.

B. Qwest Has Not Yet Resolved An Issue Relating to Escalation and Dispute Resolution, Both of Which Are Critical Components of an Effective CMP.

Qwest also suggests that the parties have reached a complete and satisfactory agreement on the CMP escalation and dispute resolution provisions. *See* Qwest Brief at page 9. While the parties have reached an interim, tentative agreement on these provisions, there is a critical ancillary issue that has yet to be resolved by the parties. That issue has two facets – (1) who bears the burden of escalating or seeking dispute resolution where a CLEC objects to a Qwest CR, *see* Covad Brief, pp. 18-19, and (2) whether a Qwest CR, escalated or taken to dispute resolution, will be implemented immediately or whether a stay will be put into place until the dispute is resolved. *Id.*, pp. 9-14. These issues are not insignificant. As set forth more fully in Covad's Brief, Qwest repeatedly and regularly has made changes that it implemented immediately and over CLEC objection. While the parties continue to work on these issues, no agreement has yet been reached, and no final agreement on the escalation and dispute resolution provisions can be concluded until the burden and implementation issues are resolved. The Commission's hand must be equally stayed until such time as an agreement is reached.

C. Qwest Has Not Closed the CMP COIL Issues.

1. Clarity and Accessibility of Qwest CMP Documents.

Qwest asserts that its CMP documents are clear and easily accessible via its web site. That assertion is inaccurate and incorrect. First, as Exception 3112 points out, the documents pertaining to production support are not clear and accessible since many of them simply don't exist or the documentation that does exist is only "cursory." *See*

Exhibit 1, pp. 2-3. Second, KPMG's Observation 3066, attached hereto as *Exhibit 2*, identified another deficiency in Qwest's CMP in that Qwest fails to provide all pertinent information (documentary and otherwise) relevant to OSS point releases, notification intervals for point release changes, and the process by which Qwest identifies CLEC impacting changes. Third, KPMG concluded in Observation 3067, attached hereto as *Exhibit 3*, that Qwest lacks "documented guidelines for prioritizing and implementing CLEC-initiated system CRs." Tellingly, all of these Observations and Exceptions, which deal specifically with the clarity and accessibility of Qwest's systems CMP documents, currently remain open.

Even more egregiously, Qwest's contention that all CMP documentation is clear and available and the CMP systems redesign is complete is belied by its own words. See KPMG Exception 3102, attached hereto as *Exhibit 4*. In that Exception, KPMG stated that Qwest's "internal OSS interface change management documentation is inconsistent and unclear." Indeed, KPMG identified 7 (fifteen, including subparts) issues where systems documentation was confusing, unclear, incomplete or completely absent. As Qwest confessed in its most recent response to Exception 3102 on February 14, 2002, it still had to provide documentation on five of the fifteen subparts, and of those five, three would be addressed "*following completion of the systems portion of the CMP Redesign.*" *Id.*, p. 20. Thus, the systems CMP still suffers from significant deficiencies (which require additional substantial work) that preclude any approval of Qwest's Section 271 application at this time.

2. Qwest Has Not Resolved All Issues Related to the Escalation and Dispute Resolution Processes or Qwest Generated CRs.

See Section II(B), above.

3. There Is No Evidence that CLECs Have Had Input into the Development of CMP.

See Covad Brief, pp. 8-18, and pages 3-4, *supra* and pages 6-8, *infra*.

4. Process for Notification of CLECs and Adequacy of Process.

Qwest suggests that the notification issue pertains only to product and process. *See* Qwest Brief, p. 12. Qwest's suggestion is wrong. While the more appalling examples of Qwest's proclivity of imposing anti-competitive burdens on CLECs come through its failure and refusal to provide adequate notice of product and process changes, as Covad pointed out in its January 18, 2002 Brief, the notice issue includes notification of systems changes as well. *See* Covad Brief, p. 17.

Moreover, in a very recently opened Exception, KPMG identified numerous instances in which Qwest failed to provide timely, clear or adequate notice of systems changes. In the month of December 2001 alone, for example, Qwest had nine system notifications in which the date of notification was earlier than its actual distribution; ten instances of late notice of system changes; and eight examples of inadequate notification of planned system outages. *See* Exception 3110, attached hereto as *Exhibit 5*. Thus, Qwest's ability to provide timely and adequate notice of system changes is also in question, and precludes any finding that Qwest's CMP currently is Section 271 compliant or that Qwest has demonstrated a pattern of compliance with the agreed upon systems CMP provisions.

D. Qwest Should Not Be Permitted to Classify as Regulatory CRs Changes Designed to Bring Qwest into Compliance with Performance Measures.

Covad concurs in AT&T and WorldCom's briefs on this issue.

E. Qwest's Change Management Process Does Not Satisfy Its Obligations Under Section 271.

As set forth more fully in Covad's January 18, 2002 Brief, Qwest's CMP is wholly insufficient to satisfy its obligations under Section 271 of the Act. In addition to grounds set forth in the Brief, Covad provides the following facts and arguments, which also demonstrate that Qwest's CMP is not Section -271 compliant.

1. Qwest's CMP Information Is Neither Clear nor Accessible.

See Section II(A), II(C)(1) and II(C)(4), above.

2. CLECs Have Not Had Substantial Input in the Design and Continued Operation of CMP.

See Sections III(A) and III(C), above, and Covad's Brief at pp. 8-24.

There is additional evidence demonstrating that Qwest's CMP is not yet Section 271 compliant because CLECs have not had substantial input into the design and continued operation of CMP. Had CLECs had such "substantial input", there never would have been cause for KPMG to open Exception 3111, attached hereto as *Exhibit 6*, in which it found that Qwest internal and external documents lack a definition or description of the roles and responsibilities of Qwest software development staff specifically responsible for the analysis of CLEC-initiated systems CRs. This is not just a "paper issue"; as KPMG opined:

KPMG Consulting deems the existence of defined roles and responsibilities for groups such as the IT staff, internal boards, external vendors, and Wholesale Change Management representatives to be indicative of whether or not a fully functional process is in place. KPMG Consulting recognizes that, prior to the CMP Redesign, Qwest operated a former process, referred to as the Co-Provider Industry Change Management Process (CICMP), and that, therein, established procedures for considering the CLEC-assigned priority of a change request in relation to such factors as available resources and Qwest-initiated priorities may have existed. KPMG Consulting would expect Qwest to be able to provide some information independent of CMP Redesign status that explains the functions of personnel who are responsible for evaluating CLEC-initiated CRs, as well as any guidelines used to carry out work assignments. This issue is unresolved. Id., p. 7 (italicization added; underlining in original).

Even more critically, KPMG also identified numerous other deficiencies that delay and negatively impact the consideration and implementation of CLEC systems CRs, including (1) Qwest's failure to provide CLECs with information as to how it allocates resources for CLEC system CRs; (2) Qwest's software team does not perform

detailed analyses of CLEC system CRs; (3) Qwest fails to document the level of and criteria for effort dedicated to individual CLEC CRs; and (4) Qwest documents lack information on the manner in which Qwest identifies CR package options for software releases.

All in all, the fact that these issues exist lead KPMG to conclude that:

The lack of established and documented development criteria, and a clear process for Qwest resource allocation for wholesale OSS, may result in the Qwest software development teams' overlooking and/or ignoring CRs deemed important to CLECs, as determined by the results of the prioritization process. Failure on the part of Qwest to attend to CRs that CLECs deem critical to their business operations in a timely manner may result in lengthy delays in implementing these changes. *This may prevent CLECs from receiving important order and pre-order functionality, thus inhibiting their ability to compete in the local exchange carrier market. Id., p. 7.*

This identified lack, and the consequent impact on CLECs' business operations, leads to the obvious conclusion that Qwest's process and procedure for CLEC-initiated systems CRs are not yet fully defined, developed and implemented. A necessary corollary of this is that CLECs cannot have had substantial input into the CMP processes for CLEC-initiated systems CRs because had such input occurred, the issues identified by KPMG would not exist. To state the corollary is to demonstrate its correctness. Accordingly, Qwest does not yet have a Section 271 compliant systems CMP.

3. CMP Does Not Define a Procedure for Timely Resolution of CMP Disputes.

See Sections II(B), above, and Covad's Brief at pp. 8-14 and 18-19.

4. Qwest Has Not Demonstrated a Pattern of Compliance.

As Qwest acknowledges, a key component of the FCC's review of Qwest's CMP is whether Qwest has "demonstrated a pattern of compliance" with its own CMP. Qwest Brief, p. 15. While Qwest claims that it has shown a pattern of compliance, *id.*, p. 18,

nothing could be farther from the truth. As KPMG opined in Exception 2003, attached hereto as *Exhibit 7*, “Qwest does not follow its established release notification schedule when implementing IMA releases, and does not provide complete and accurate information in its release notifications to enable co-providers to prepare adequately for certification and implementation of new releases.” *Id.*, p.1. While Qwest initially deflected any further KPMG scrutiny by stating that these issues would be addressed in the redesign effort, Qwest recently conceded that several of the issues had yet to be addressed in the redesign effort. *Id.*, pp. 6-7. Thus, if the issues have yet to be addressed, Qwest cannot, as a matter of fact or law, have demonstrated a pattern of compliance with the processes and procedures by which Qwest is supposed to comply when implementing IMA releases. *See also* Section II(C), above.

F. A Section 271 Review of CMP Must Include Product and Process.

CLECs are not alone in their position that Qwest’s product and process CMP is an appropriate subject of Section 271 scrutiny. As KPMG pointed out in Exception 3094, attached hereto as *Exhibit 8*:

CMP is an *essential element* of ongoing CLEC business operations and of the Qwest-CLEC business relationship. Because it *governs an important part of all CLEC interaction with Qwest*, KPMG Consulting would expect at a minimum, that Qwest CMP would feature the following functions:

- Qwest notifies CLECs of all CLEC-impacting changes with complete information and sufficiently in advance of such changes;
- CMP includes the procedures through which Qwest takes into consideration the feedback from CLECs on all proposed CLEC-impacting changes; and
- CLECs have the opportunity to modify, discuss, and escalate issues encountered with proposed changes.

Because Qwest’s CMP currently does not include these three elements for systems, product and process, KPMG concluded that Qwest’s CMP would “*not satisfy*” the

criteria for the Section 271 OSS tests. Indeed, KPMG made clear that Qwest's CMP was ineffective in resolving disputes and "lack[] a defined and documented change management process," *id.*, p. 16, and thus, as a matter of law, Qwest's CMP does not meet the FCC's criteria for an acceptable process for change control.

Compounding the ineffectiveness of Qwest's CMP -- regardless of whether the focus is systems, product or process, is Qwest's failure to provide adequate, timely or accurate notice to CLECs of all three categories of change. As KPMG pointed out in Exception 3110, *see Exhibit 5*, for all categories of change, KPMG documented in December 2001 alone numerous instances in which Qwest provided (1) untimely notice; (2) notice containing incorrect topics in the email headline; (3) late notice of system changes; (4) an inadequate interval for planned outage notices; (5) inadequate information; and (6) lack of adequate tracking and verification. Consequently, as KPMG concluded, Qwest's failure to provide sufficient and adequate notice may result in "CLEC operational inefficiencies, thereby reducing CLEC profitability and impacting the CLEC's ability to compete in the Local Exchange Carrier market." *Id.*, p. 5. Thus, regardless of whether evaluated under Checklist Item 2 or under the public interest standard of the Act, Qwest's CMP is not compliant because of well-documented problems that result in an anti-competitive burden being placed on CLECs.

III. CONCLUSION

For the reasons set forth more fully above and in Covad's Brief on Qwest Corporation's ("Qwest") Change Management Process, the Commission should find that Qwest has not yet developed, implemented and demonstrated compliance with a Section 271 sufficient change management process. Qwest's application for Section 271 relief in this State cannot be approved at this time.

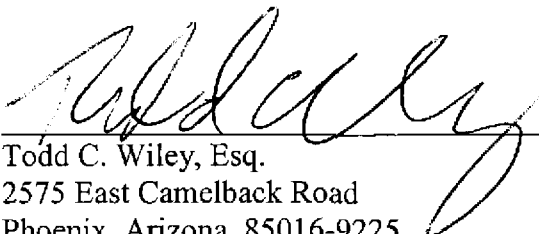
RESPECTFULLY SUBMITTED this 19th day of February, 2002.

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CERTIFICATE OF SERVICE

I, Todd C. Wiley, Esq., hereby certify that an original and ten (10) copies of the Covad Communications Company's Supplemental Brief on Qwest Corporation's Change Management Process, Docket No. T-00000A-97-0238, were filed on this 19th day of February, 2002, to the following:

Arizona Corporation Commission
Docket Control-Utilities Division
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Phoenix, AZ 85007-2996

and a true and correct copy of Covad Communications Company's Supplemental Brief on Qwest Corporation's Change Management Process, was served via hand delivery or overnight mail this 19th day of February, 2002, on the following:

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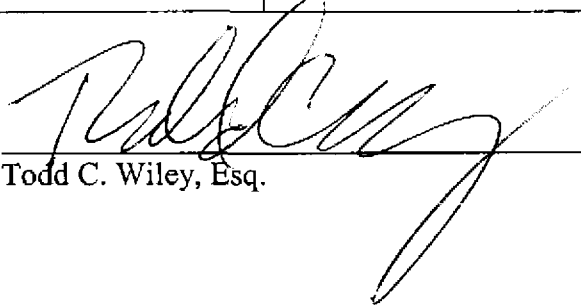

Todd C. Wiley, Esq.

Exhibit 1



ROC Observation & Exception Formal Response

Test Vendor ID: EXP 3112
Qwest Internal Tracking ID: TI 829
Observation/Exception Title: OSS Interfaces
Test Type/Domain: Test 24 - Interface Dvlpmnt & Relationship Mgt
Date Qwest Received: 01/30/2002
Initial Response Date: 02/13/2002

Test Incident Summary:

An exception has been identified as a result of test activities associated with the Change Management Review, MTP Test 23, and Wholesale Systems Help Desk (WSHD), MTP Test 24.7.

Exception:

Qwest has not implemented a comprehensive and fully documented production support process to address changes that correct failures in the production version(s) of OSS interfaces.

Background:

Production support changes address defects in the production version(s) of an OSS interface. Such defects may include interrupted connectivity, failed transactions, system crashes, degraded performance, data corruption, memory leaks, and/or functionality not coded to specification.

The purpose of a production support process is to quickly and effectively restore critical production components by repairing defects or implementing temporary work-around processes. This process would also include the implementation of a tactical plan to complete restoration of normal production capabilities. For critical situations, the standard software release intervals associated with the established Change Management Process (CMP) are considered too long to implement corrective changes.

KPMG Consulting would expect a comprehensive and fully documented production support process to include the following sub-procedures and essential elements:

- A. Identification and verification procedures;
- B. Evaluation, categorization, and prioritization procedures;
- C. Internal and external communication procedures;
- D. Status tracking and reporting procedures;
- E. Escalation procedures;
- F. Restoration and closure procedures;
- G. Testing procedures, including support for defects observed in test environments;
- H. Documentation management procedures; and
- I. Training procedures.

Issue:

KPMG Consulting has observed that Qwest does not have a documented production support process in place to resolve time-sensitive production support issues and changes. KPMG Consulting formally identified this issue in Observation 3052. In response, Qwest provided KPMG Consulting with documents



ROC Observation & Exception Formal Response

that specify OSS contingency plans. KPMG Consulting reviewed Qwest documentation, and determined that Qwest does not have a distinct, consolidated process document to address the issue in question.¹

Impact:

In the absence of a comprehensive and fully documented production support process, CLECs do not have assurance that failures in the production version(s) of OSS interfaces can be corrected efficiently and effectively. The absence of these defined corrective measures can lead to downtime, miscommunication about the status of an interface system outage or issue, and delays in critical systems resolutions, which can negatively impact CLECs' business operations.

Appendix A

Production Support Matrix

KPMG Consulting reviewed the following Change Management Process documents for the existence of the nine criteria that are outlined in the Background section of this Exception:

- *Co-provider Industry Change Management Process (CICMP) document*,²
- *IMA Change Management Document*,³
- *Master Redlined CMP Redesign Production Support Language – 12/11/2001*,⁴ and
- *Master Red-lined CLEC-Qwest CMP Re-Design Framework – Interim Draft* dated 12/10/2001.⁵

Production Support Matrix

Reference Criteria	Production Support Sub-Process	Effective CICMP ⁶	Proposed Redline CMP ⁷
A	Identification and verification procedures	Not documented/missing	Not documented/missing
B	Evaluation, categorization, and prioritization procedures	Prioritization document not finalized; CLECs and Qwest still determining how prioritization of low severity, Type 1 category changes are to be prioritized.	TI676-A section 1.4 provides cursory review of prioritization process
C	Internal and external communication procedures	Executive summary, section I.III, II.I, and III cover communication without specific details about Production Support. No reference made to Production Support types	TI676-A sections 1.5 and 1.6 provide cursory review of communication requirements.

¹ In its response dated 12/28/2001, Qwest stated that "each Qwest back-end system will follow its own process for problem resolution and prioritization of fixes and communicate status back to the Help Desk." KPMG Consulting interprets this to mean that Qwest lacks a single, operational system to address production support issues.

² The *CICMP Document* dated 5/11/2001 represents the CMP document in place before the start of CMP Redesign. It is located at <http://www.qwest.com/wholesale/cmp/whatiscmp.html>.

³ The IMA CMP Document dated 11/01/01 and defines the process through which Qwest prioritizes and processes Change Requests for IMA software releases.

⁴ The redline document is located at <http://www.qwest.com/wholesale/cmp/redesign.html>

⁵ The redline document is located at <http://www.qwest.com/wholesale/cmp/redesign.html>

⁶ Effective documentation such as CICMP (05/14/01), Escalation (12/01/00), Qwest RN Enhancements (12/06/00), and Industry Team CR Prioritization (12/01/00) are available at <http://www.qwest.com/wholesale/cmp/whatiscmp.html>

⁷ Proposed redline documents change frequently. The current draft documentation is available at <http://www.qwest.com/wholesale/cmp/redesign.html>



ROC Observation & Exception Formal Response

		of changes.	
D	Status tracking and reporting procedures	Section III.VIII.6 covers CR and RN databases, not Trouble Tickets or Production Support	TI676-A section I.3 provides cursory review of reporting processes
E	Escalation procedures	Escalation document covers CRs but not Production Support	Not documented/missing
F	Restoration and closure procedures	Not documented/missing	Not documented/missing
G	Testing procedures, including test environments	Not documented/missing	TI676-B section "Joint Testing Period" provides cursory review of the testing process
H	Documentation management procedures	CICMP document executive summary, section III, and section III.II.5 define a number of document requirements. However, no specifics are provided.	Not documented/missing
I	Training procedures	Not documented/missing	Not documented/missing

Qwest Formal Response:

In the 01/24/02 response to EXP 3102, Qwest committed to provide an integration document to KPMG by February 7, 2002. This document has been provided to KPMG via the usual data request process. The Integration Document addresses criteria A and criteria C – G outlined by KPMG in the "Background" section of this exception.

Criteria B refers to evaluation, categorization, and prioritization procedures. The Wholesale CMP prioritization document has not been finalized, pending the completion of CMP Redesign. This portion of the redesign effort is anticipated to be completed by February 19, 2002. Qwest will provide an update on the status of this item by February 22, 2002.

Qwest is in the process of making revisions to the Integration Document that address documentation management procedures and training procedures identified in criteria H & I above. Qwest will provide an updated version of the Integration Document by February 22, 2002 that will address criteria H and I.

Attachment(s): None

Exhibit 2

OBSERVATION 3066 – SECOND RESPONSE

Qwest OSS Evaluation

Initial Release Date: December 12, 2001

First Response Date: January 6, 2002

Second Response Date: January 24, 2002

OBSERVATION REPORT

An observation has been identified as a result of the test activities associated with the Change Management Test, MTP Test 23.

Observation:

Qwest does not consistently employ the defined Change Management Process (CMP) to exclude CLEC-impacting system changes from point release versions of the Interconnect Mediated Access (IMA) interface.

Background:

IMA is a Qwest system that enables CLECs to access local telephone service elements of the Qwest network and Operations Support Systems. It automates the process by which Local Service Requests submitted by CLECs are used to create service orders.

Qwest has defined two types of IMA release implementations¹, with attributes as follows:

Major releases (e.g., IMA 8.0) –

- Add functionality to systems and processes;
- Scheduled three times per calendar year; and
- Changes are subject to the prioritization process.

Point releases (e.g., IMA 8.01) –

- Only concern back-end systems;
- Augment functionality disclosed in major releases; and
- Changes are not subject to the prioritization process.

In the context of the monthly CMP meeting and CMP Redesign Process, Qwest has stated that point releases do not require CLECs to make system or process changes². Unlike change requests that comprise major system releases, point release changes are not subject to the prioritization process.

¹ Refer to page three of the draft meeting minutes for Qwest's 10/30/2001-11/1/2001 CMP Redesign session. At that meeting, Jeff Thompson, Qwest's IT Director of ASR and Center Efficiency Processes, explained to CLEC participants the differences between a major release and a point release.

² See meeting minutes for Qwest's 10/16/2001 and 10/30/2001-11/1/2001 CMP Redesign working sessions, respectively, and meeting minutes for the 10/18/2001 Systems CMP Meeting at <http://www.qwest.com/wholesale/cmp/teammeetings.html>.

OBSERVATION 3066 – SECOND RESPONSE

Qwest OSS Evaluation

Issue:

Qwest does not consistently apply the defined CMP for CLEC-impacting system changes for point releases to the IMA interface. KPMG Consulting has observed at least two examples of point release changes that required, or would have required, a number of CLECs to make internal changes, such as employee training and process enhancements:

1. Qwest implemented changes to a backend database in IMA 6.01, and did not inform CLECs of the changes. This implementation resulted in CLECs' inability to process orders.³
2. A more recent instance involves Change Request (CR) 25152⁴ in IMA 8.01. Qwest presented this GUI-only change at the monthly Systems CMP meeting on October 18, 2001, and announced that the change would be implemented on November 19, 2001. Qwest removed this CR from IMA 8.01 in early November, after CLECs Allegiance, AT&T, and Eschelon raised concerns about this issue, stating that the CR was CLEC-impacting.⁵

Furthermore, it does not appear that clearly defined, documented Qwest processes or procedures exist to ensure that all CLEC-impacting IMA changes are identified and submitted for CLEC voting, as part of the prioritization process.

Impact:

The absence of a defined process for identifying CLEC-impacting changes, combined with inconsistent use of the documented CMP process, makes it difficult for CLECs to prepare for and respond to Qwest point releases. This exposes CLECs to unnecessary risks from changes that could impact their business operations and service to end-use customers.

Question:

What steps will Qwest take to ensure that CLEC-impacting systems changes are identified and communicated to CLECs through the CMP process?

³ This issue led to the HP filing of Exception 2007.

⁴ CR#25152 "Enhancements for Appointment Scheduler" will require a CLEC to schedule an LSR appointment based on Qwest's resource availability.

⁵ See the meeting minutes for the 10/18/2001 Systems CMP Meeting and Action Item #366 in the 11/15/2001 Systems CMP Distribution Package at http://www.qwest.com/wholesale/downloads/2001/011109/November_15_Package.pdf

OBSERVATION 3066 – SECOND RESPONSE

Qwest OSS Evaluation

Qwest Formal Response (12/20/01):

Qwest and the CLECs have already reached interim agreements on numerous processes associated with CLEC-impacting systems changes including those related to point releases. These agreements are documented in the *Master Redlined CLEC-Qwest CMP Re-design Framework – Revised 12-10-01*, <http://www.qwest.com/wholesale/cmp/redesign.html>, include:

- CR origination processes for Qwest and CLEC OSS Interface CRs
- Introduction of a New OSS Interface
- Changes to an Existing OSS Interface
- Retirement of an OSS Interface.

Qwest and the CLECs have agreed to implement these processes coincidentally with the implementation of the IMA 10.0 release in June 2002. Qwest and the CLECs will continue to collaboratively monitor and refine these processes through CMP.

Qwest and the CLECs are currently negotiating the *Qwest Proposed Prioritization Language* to document a process that will ensure that CLECs will have an opportunity to rank CLEC and Qwest submitted CRs. The Redesign Team is also negotiating provisions within the *Qwest Proposed Prioritization Language* to allow CLECs to prioritize Regulatory and Industry Guideline CRs, provided that the prioritization of these does not cause them to miss their mandated implementation dates. This language is scheduled for discussion at the January 22, 2002 CMP Re-design Meeting. Additionally, the Re-Design team continues to work toward collaboratively, and formally, addressing the definition of major and point releases.

To ensure that these agreed to processes are implemented quickly and effectively, Qwest is developing internal CMP training that is mandatory for Qwest IT personnel who work with systems that impact the CLECs.

KPMG Consulting's First Response (01/06/02):

KPMG Consulting reviewed Qwest's response and identified the following issues:

1. KPMG Consulting is aware of the ongoing CMP Redesign effort, but is unable to locate information in the *Master Redlined CLEC-Qwest CMP Re-design Framework* that indicates and explains how Qwest-initiated point-release changes are subject to the prioritization process. It is unclear how much information Qwest communicates to CLECs about point-release changes, and how Qwest

OBSERVATION 3066 – SECOND RESPONSE

Qwest OSS Evaluation

systematically identifies all CLEC-impacting changes and submits them for CLEC voting, as part of the prioritization process.

2. KPMG Consulting requests that Qwest provide related documentation for validation and verification of CMP training for Qwest IT personnel.

Qwest Response to KPMG Comments (01/14/02):

The following response addresses the two issues raised by KPMG in their response dated January 6th, 2002. KPMG's issues have been replicated in *Italics* for ease of reading.

1. *KPMG Consulting is aware of the ongoing CMP Redesign effort, but is unable to locate information in the Master Redlined CLEC-Qwest CMP Re-design Framework that indicates and explains how Qwest-initiated point-release changes are subject to the prioritization process. It is unclear how much information Qwest communicates to CLECs about point-release changes, and how Qwest systematically identifies all CLEC-impacting changes and submits them for CLEC voting, as part of the prioritization process.*

Upon further review, Qwest has determined that the *Master Redline* document does not address the point release issues identified by KPMG in this observation. This is because Qwest and the CLECs have not yet agreed to the prioritization language that will be included in the *Master Redline* document. The CLECs and Qwest should finalize the prioritization language during the next CMP Redesign Meeting scheduled for January 22-24, 2002.

Point Releases were discussed in the October 30th, 2001 CMP Redesign Meeting. During that session, Jeff Thompson (Qwest IT) defined a point release as follows: "a point release is a Qwest release that has no impact to CLEC code on the interface (excluding previously disclosed changes) and could include a fix for bugs introduced in the major release." He further explained that "a point release could be changing something in the GUI only, or implementing a code change Qwest had included in the release but that had not been activated in the major release." (CMP Re-Design Meeting October 30 - November 1 Final Minutes - 11-30-01, page 3, paragraph 2, http://www.qwest.com/wholesale/downloads/2001/011130/CMP_Redesign_Meeting_Oct_30-31_Nov_1_Final_Minutes.doc) Qwest and the CLEC community have agreed that "Point Release[s] may not be CLEC code impacting, but may affect CLEC operating procedures. The purpose of a point release is to fix bugs introduced in previous releases, implement technical changes, make changes to the GUI, and deliver enhancements disclosed for a prior major release that could not be delivered in the timeframe of that release." (Qwest Proposed TERMS Language - 11-30-01, http://www.qwest.com/wholesale/downloads/2001/011206/Qwest_Proposed_TERMS_Language-11-30-01.doc)

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Qwest communicates all changes impacting the CLEC community via the defined CMP procedures. If a point release does not contain changes that impact the CLEC code it may not go through the CMP. However, all point releases will comply with the standard IT notification requirements. Although the CMP is now being redefined, CLEC notification currently includes 1) discussion of the change during the regularly scheduled CMP meetings and 2) publication of the changes in the release notes. Qwest will comply with all approved modifications to CMP notification requirements.

Qwest and the CLEC community have had and continue to have an ongoing dialogue regarding what constitutes a CLEC-impacting change. It is anticipated that a common understanding will be reached through the CMP Redesign.

2. *KPMG Consulting requests that Qwest provide related documentation for validation and verification of CMP training for Qwest IT personnel.*

To be submitted as a confidential data request attachment is a PowerPoint document which contains the Wholesale Change Management Process (CMP) Training Module 1. To date, 9232 Qwest employees and contractors have taken part in this training. Of those having taken part in the training, 1342 are members of the IT staff. Additional training is under development and will be provided as the CMP Re-design progresses.

Attachment(s): Confidential DR to be filed

KPMG Consulting's Second Response (01/24/02):

KPMG Consulting confirms that it received the referenced PowerPoint document, which contains Wholesale CMP Training Module 1 used to train Qwest IT personnel. KPMG Consulting reviewed the document, and found that it contains a high-level overview of CMP. Based on information from this document, and from Qwest's January 14, 2002 response, KPMG Consulting understands that Qwest is committed to continuing to update and develop CMP training for its employees in the future.

KPMG Consulting reviewed Qwest's response, and understands that point release changes are not necessarily subject to the CR prioritization process. Nevertheless, the following issues, which were identified in KPMG Consulting's First Response, dated January 6, 2002, remain unresolved:

- The amount of information that Qwest communicates to CLECs about point-release changes;
- The notification intervals for point-release changes; and
- The process by which Qwest systematically identifies all CLEC-impacting changes.

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Qwest OSS Evaluation

KPMG Consulting introduced two examples in this Observation to illustrate that the changes in question had, or would have had, a material impact on the CLECs' ability to process orders. This appeared to conflict with the Qwest-provided definition of point releases, which states that they concern changes that only apply to back-end interface systems and should not affect CLEC's ability to process orders.⁶

KPMG Consulting attended the Change Management Process Re-design meetings on January 22 and 23, 2002. KPMG Consulting will continue to gather information related to point release changes from future Re-design sessions.

KPMG Consulting recommends that this Observation remain open pending resolution of the above issues.

Attachment(s): None

⁶ During a KPMG Consulting interview on September 25, 2001, Mark Routh, then CMP (Systems) Manager, stated that, "Point release changes add functionality disclosed in major releases but only concern back-end systems." This definition is consistent with subsequent Qwest descriptions of point releases during CMP Redesign meetings.

Exhibit 3

OBSERVATION 3067 – SECOND RESPONSE

Qwest OSS Evaluation

Initial Release Date: December 12, 2001

First Response Date: January 6, 2002

Second Response Date: January 30, 2002

OBSERVATION REPORT

An observation has been identified as a result of the test activities associated with the Change Management Test, MTP Test 23.

Observation:

Qwest Systems Change Management Process (CMP) lacks guidelines for prioritizing and implementing CLEC-initiated systems Change Requests (CRs).

Background:

The Qwest Systems CMP is the method used by both Qwest and CLECs to implement changes to Qwest wholesale OSS interfaces. This process includes initiation, clarification/evaluation, presentation, prioritization, implementation, and completion of all proposed changes. CLECs participate in the CR Prioritization Process to vote on CRs that have been submitted by both Qwest and CLECs.¹ The outcome of this CR Prioritization Process determines if CRs deemed critical to CLEC business operations will be included in an upcoming OSS release.

Issue:

Qwest Systems CMP lacks documented guidelines for prioritizing and implementing CLEC-initiated systems CRs. KPMG Consulting reviewed existing Qwest documentation, including the *Co-Provider Industry Change Management Process (CICMP) Document* and the *CICMP – CR Prioritization Process Document*², and noted the following:

- Qwest documents lacked information on the roles and responsibilities of Qwest staff involved in the analysis of CLEC-initiated systems CRs;
- Qwest documents lacked information on how Qwest allocated available resources (capacity) for all systems CRs to be included in an OSS release;
- Detailed business analyses and system analyses from the Qwest software development team were not performed for all CLEC-initiated CRs;
- Qwest documents lacked definitions and criteria for the Level of Effort (formerly known as “T-shirt size”) assignment for individual CRs; and

¹ In the context of CMP Redesign, Qwest and CLECs have not yet agreed on whether or not regulatory and industry guideline CRs are subject to the CR Prioritization Process.

² The *CICMP Document* and *CICMP – CR Prioritization Process Document*, located at www.qwest.com/wholesale/cmp/whatiscmp.html, represent the most recent Qwest documents relevant to the CR Prioritization Process prior to the initiation of CMP Redesign.

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Qwest OSS Evaluation

- Qwest documents lacked information on how Qwest identified CR package options for a software release that it recommended to CLECs, following the CR Prioritization Process.

Impact:

In the absence of guidelines for the system CR Prioritization Process, there is no assurance that all CRs receive a thorough assessment from the Qwest software development team. In addition, it is unclear how Qwest allocates resources for the wholesale OSS to accommodate CLEC business needs, and how Qwest estimates the resources required to complete individual CLEC-initiated CRs. Failure on the part of Qwest to attend to CRs that CLECs deem critical to CLEC business operations in a timely manner may result in lengthy delays in implementing these changes. In fact, the limited capacity that Qwest allows for each release may categorically prevent the implementation of some CRs.

Qwest Formal Response (12/20/01):

Qwest responses to the 5 KPMG stated issues.

1. *"Qwest documents lacked information on the roles and responsibilities of Qwest staff involved in the analysis of CLEC-initiated systems CRs."*

Once approved by the Re-design Team, the Master Redline CLEC-Qwest CMP Re-Design Framework Interim Draft - Revised 12-10-01, located at <http://www.qwest.com/wholesale/cmp/redesign.html>, will further illuminate the process, roles and responsibilities of Qwest personnel during the preliminary evaluation and subsequent prioritization of CLEC-initiated systems CRs.

2. *"Qwest documents lacked information on how Qwest allocated available resources (capacity) for all systems CRs to be included in an OSS release."*

Qwest and the CLECs are currently negotiating the extent to which Qwest will disclose this business information to the CLECs. This issue will be resolved and included in the Qwest Proposed Prioritization Language when it is accepted by the Re-design Team.

3. *"Detailed business analyses and system analyses from the Qwest software development team were not performed for all CLEC-initiated CRs."*

Detailed business and systems requirement development occurs after the CLECs and Qwest prioritize the list of CLEC initiated CRs pursuant to the Co-Provider Industry Change Management Process document, Section IV. Additionally, the Qwest Proposed Prioritization Language, collaboratively written by Qwest and the CLECs, but not yet adopted by the Re-design Team, details the following:

OBSERVATION 3067 – SECOND RESPONSE

Qwest OSS Evaluation

- There is insufficient space to include all CLEC initiated CRs in the upcoming release. The prioritization process channels the business and system requirements development effort.
 - The business and system requirement development effort begins with CRs at the top of the prioritization list and continues down the list until all available development resources are exhausted.
 - Business and systems requirements are developed for more CRs than can ultimately be included in the release.
4. *“Qwest documents lacked definitions and criteria for the Level of Effort (formerly known as “T-shirt size”) assignment for individual CRs.”*

The *Co-Provider Industry Change Management Process* document does not have specific definitions for Level of Effort. However, in the *Master Red-Lined CLEC-Qwest CMP Re-Design Framework Interim Draft - Revised 11-29-01* the following language has been agreed to in the *CLEC-Qwest OSS Interface Change Request Initiation Process* section:

“Identification of the preliminary level of effort (S, M, L, XL) required to implement the CR.

- Small – requires changes to only one subsystem of a single system
- Medium – requires changes to 2 or more subsystems of a single system
- Large – requires changes to 2 or more systems or complex changes in multiple subsystems of a single system
- Extra Large – requires extensive redesign of at least one system.”

Additionally, Qwest and the CLECs are currently negotiating a refined preliminary Level of Effort criteria based on a rough estimate of the number of people-hours necessary to complete a CR.

5. *Qwest documents lacked information on how Qwest identified CR package options “for a software release that it recommended to CLECs, following the CR Prioritization Process.”*

The CLEC-Qwest OSS Interface Change Request Initiation Process section of the *Master Red-Lined CLEC-Qwest CMP Re-Design Framework Interim Draft - Revised 12-10-01* provides the following language which has been agreed to by the CLECs and Qwest:

“At the monthly CMP meeting following the completion of the business and system requirements, Qwest will conduct a packaging discussion, which may include packaging options based on any affinities between candidates on the release candidate list. The newly packaged list of CRs will be used as the release candidate list during the design phase of a release. At the monthly CMP meeting

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following the completion of design, Qwest will commit to a final list of CRs for inclusion in the release.”

KPMG Consulting’s First Response (01/04/02):

KPMG Consulting reviewed Qwest’s responses, and identified the following issues:

1. KPMG Consulting reviewed the *Master Redline CLEC-Qwest CMP Re-Design Framework* document but is unable to identify information therein that describes the roles and responsibilities of Qwest staff who conduct business and system analyses of CLEC-initiated systems CRs.
2. KPMG Consulting is aware of the ongoing CMP Redesign effort, and requests that Qwest provide related documentation for review, once it is finalized.
3. KPMG Consulting is aware of the possibility that not all CLEC-initiated, CLEC-prioritized CRs may be included in a given, upcoming release. It is thus critical that Qwest’s software development team conducts a thorough assessment of all CRs, and provides CLECs with adequate information (see the following paragraph) so that CLECs are able to make informed decisions about *all CRs* during the prioritization process.
4. Based on the definitions of the preliminary levels of effort (S, M, L, and XL), KPMG Consulting could not quantify the amount of work performed by the Qwest software development team, or the total amount of work required for each software release. It is unclear how the above specifications would inform CLECs of the overall capacity of a given, upcoming release, and enable CLECs to make informed decisions on the bases of interdependences, as well as tradeoffs, among numerous CRs, during the prioritization process.
5. KPMG Consulting reviewed the cited text and is unable to identify the criteria that Qwest software developers utilize to identify affinities between candidates.

Qwest Response to KPMG Comments (01/14/02):

The following response addresses the five issues identified by KPMG in their response dated January 4th, 2002. KPMG’s issues have been replicated below in *Italics* for ease of reading.

1. *KPMG Consulting reviewed the Master Redline CLEC-Qwest CMP Re-Design Framework document but is unable to identify information therein that describes the roles and responsibilities of Qwest staff who conduct business and system analysis of CLEC-initiated systems CRs.*

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There has been no definitive discussion in CMP Redesign sessions to include a detailed description of the roles and responsibilities of Qwest staff who do not interface directly with CLECs on CMP functions, including those who conduct detailed business and system analyses of CLEC-initiated systems CRs. However, once approved by the Re-design Team, the Master Redline CLEC-Qwest CMP Re-Design Framework Interim Draft will further describe the process, roles and responsibilities of Qwest personnel who participate in the preliminary evaluation and subsequent prioritization of CLEC-initiated systems CRs.

As stated in Qwest's initial response, this text is not included in the *Master Redline* document because it has yet to be reviewed and approved by the CMP Redesign team. A draft of the text is contained in the document *Qwest Proposed Managing the CMP Language - Revised 11-20-01* which is located in the *Redesign Documentation* section of the Qwest CMP Redesign Web site.

(<http://www.qwest.com/wholesale/downloads/2001/011121/PrpManagingCMPLang.doc>).

2. *KPMG Consulting is aware of the ongoing CMP Redesign effort, and requests that Qwest provide related documentation for review, once it is finalized.*

Qwest will continue to publish completed and accepted Redesign documentation in the form of the most recent update of the Master Redline CLEC-Qwest CMP Re-Design Framework Interim Draft. This document is available on the Qwest CMP Redesign Web site, <http://www.qwest.com/wholesale/cmp/redesign.html>.

Additionally, Qwest distributes an email message containing all Redesign documentation, agreed-to and proposed, before and after each Redesign session. KPMG representatives are included in these distributions. The next meeting of the CMP Redesign team is scheduled for January 22nd through 24th, 2002. The findings should be documented by January 28th, 2001. If that timetable is met, KPMG will receive the revised documentation no later than January 29th, 2002.

3. *KPMG Consulting is aware of the possibility that not all CLEC-initiated, CLEC-prioritized CRs may be included in a given, upcoming release. It is thus critical that Qwest's software development team conducts a thorough assessment of all CRs, and provides CLECs with adequate information (see the following paragraph) so that CLECs are able to make informed decisions about all CRs during the prioritization process.*

As discussed, agreed-to, and documented in Section 3.0 of the *Master Redline*, an initial "rough estimate" of the level of effort (LOE) for each CR is determined as an aid in CLEC prioritization. Due to resource constraints, Qwest is unable to commit to conduct a detailed assessment of the level of effort (LOE) for every release candidate.

4. *Based on the definitions of the preliminary levels of effort (S, M, L, and XL), KPMG Consulting could not quantify the amount of work performed by the Qwest software*

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development team, or the total amount of work required for each software release. It is unclear how the above specifications would inform CLECs of the overall capacity of a given, upcoming release, and enable CLECs to make informed decisions on the bases of interdependencies, as well as tradeoffs, among numerous CRs, during the prioritization process.

After discussion during several recent Redesign meetings Qwest and the CLECs agreed to no longer utilize “T-shirt” sizing to categorize the level of effort for a release candidate. At Redesign meetings Qwest has agreed to provide CLEC’s with actual level of effort range estimates in order for CLEC’s to prioritize which CRs can be included in a major release. Qwest is currently developing these range estimates, and will present them to the CLECs at the January 2002 Redesign session. These estimated ranges are not intended to give the CLECs a view of the overall capacity of the release.

Qwest and the CLECs have agreed to a process documented in Section 3.0 of the *Master Redline* that will provide the CLECs with meaningful information with which to make informed decisions regarding the prioritization of CRs. That process is currently written as follows but will be updated to remove the T-shirt sizing when the ranges have been agreed upon.

“Qwest will review the CRs received prior to the cut off date and evaluate whether Qwest can implement them. Qwest’s responses will be one of the following:

- “Accepted” (Qwest will implement the CLEC request) with position stated. If the CR is accepted, Qwest will provide the following in its response:
 - Determination and presentation of options of how the CR can be implemented
 - Identification of the preliminary level of effort (S, M, L, and XL) required to implement the CR. (WCOM COMMENT: WCOM WOULD LIKE IT NOTED THAT A REQUEST WAS MADE AS TO WHAT IS MEANT BY PRELIMINARY LEVEL OF EFFORT AND IS TO BE DEFINED BY QWEST.)
 - Small – requires changes to only one subsystem of a single system
 - Medium – requires changes to 2 or more subsystems of a single system
 - Large – requires changes to 2 or more systems or complex changes in multiple subsystems of a single system
 - Extra Large – requires extensive redesign of at least one system.

If CLECs do not accept Qwest’s response, they may elect to escalate or dispute the CR in accordance with the agreed upon CMP escalation or dispute resolution procedures. If the originating CLEC does not agree with the determination to escalate or pursue the dispute resolution, it may withdraw its participation from

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the CR and any other CLEC may become responsible for pursuing the CR upon providing written notice to the Qwest CMP Manager. If the CLECs do not accept Qwest's response and do not intend to escalate or dispute at the present time, they may request Qwest to status the CR as deferred. The CR will be status deferred and CLECs may activate or close the CR at a later date.

At the monthly CMP meeting, the CR originator will provide an overview of its respective CR(s) and Qwest will present either a status or its response.

Qwest or CLEC originated CRs for changes to an existing OSS interface will then be prioritized by the CLECs and Qwest, resulting in the initial release candidate list. CLEC or Qwest originated CRs for introduction of a new interface or retirement of an existing interface are not subject to prioritization and will follow the introduction or retirement processes outlined in Sections x and x of the *Master Redline*, respectively.

Based on the initial release candidate list, Qwest will begin its development cycle, which includes the following milestones:

- Business and systems requirements: Qwest engineers define the business and functional specifications during this phase. The specifications are completed on a per candidate basis in priority order.
- **(AT&T Comment) Packaging: Qwest and CLECs will discuss grouping candidates with affinities may be addressed more efficiently if taken together.[AT&T comment: this may not be exactly the right description. We just wanted to add this to this list of steps.]**
- Design: Qwest engineers define the architectural and code changes required to complete the work associated with each candidate. The design work is completed on a per candidate basis in priority order.
- Code & Test: Qwest engineers will perform the coding and testing required to complete the work associated with each candidate. The code and test work is completed on a per candidate basis in priority order.

Using the initial release candidate list, Qwest will begin business and system requirements. During the business and systems requirement efforts, CRs may be modified or new CRs may be generated (by CLECs or Qwest), with a request that the new or modified CRs be considered for addition to the release candidate list (late added CRs). **(WCOM COMMENTS: CHANGE "INITIAL RELEASE CANDIDATE LIST TO "RELEASE CANDIDATE LIST.)** If the CMP body grants the request to consider the late added CRs for addition to the release candidate list, Qwest will size the CR's requirements work effort. If the requirements work effort, for the late added CRs, can be completed by the end of system requirements, the initial release candidate list and the new CRs will be prioritized by CLECs in accordance with the agreed upon Prioritization Process (see Section xx of the *Master Redline*). If the requirements work effort, for the

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late added CRs, cannot be completed by the end of system requirements, the CR will not be eligible for the release and will be returned to the pool of CRs that are available for prioritization in the next OSS interface release.

At the monthly CMP meeting following the completion of the business and system requirements, Qwest will conduct a packaging discussion, which may include packaging options based on any affinities between candidates on the release candidate list. The newly packaged list of CRs will be used as the release candidate list during the design phase of a release. At the monthly CMP meeting following the completion of design, Qwest will commit to a final list of CRs for inclusion in the release.”

This process, agreed-to by Qwest and the CLECs, provides a Level of Effort to the CLECs to use during Prioritization and outlines to process for Qwest to present various packaging options to the CLECs.

5. *KPMG Consulting reviewed the cited text and is unable to identify the criteria that Qwest software developers utilize to identify affinities between candidates.*

The assessment and identification of candidate affinities is not a structured process. Qwest relies on the knowledge and experience of its system architects and analysts to identify opportunities for efficiency in all areas of system development including those related to candidate affinity. A few of the factors considered in assessing affinities include modifications to common modules or data components, changes to common transactions, and use of common resources.

KPMG Consulting’s Second Response (01/30/02):

KPMG Consulting reviewed Qwest’s response dated January 14, 2002, and found the issues identified in this Observation remain unresolved.

KPMG Consulting recommends closing Observation 3067 and escalating the unresolved issue to Exception 3111.

Exhibit 4



ROC Observation & Exception Formal Response

<i>Test Vendor ID:</i>	EXP 3102
<i>Qwest Internal Tracking ID:</i>	TI 777
<i>Observation/Exception Title:</i>	Change Management Practices
<i>Test Type/Domain:</i>	Test 23 – Change Management
<i>Date Qwest Received:</i>	12/17/2001
<i>Initial Response Date:</i>	12/28/2001
<i>Supplemental Response Date:</i>	01/14/2002
<i>2nd Supplemental Response Date:</i>	01/25/2002
<i>3rd Supplemental Response Date:</i>	02/07/2002
<i>4th Supplemental Response Date:</i>	02/08/2002
<i>5th Supplemental Response Date:</i>	02/14/2002

Test Incident Summary

Exception 3102 was initially released as Observation 3044 on November 1, 2001. KPMG Consulting recommended on December 17, 2001 that Observation 3044 be closed and moved to Exception 3102.

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Change Management Practices Verification and Validation Review, MTP Test 23.

Exception:

Qwest's internal OSS interface change management documentation is inconsistent and unclear.

Background:

Qwest utilizes an internal OSS change management process to manage the succession of four major phases of work—to initiate, develop, deploy, and retire changes in an OSS interface, as listed in the *Change Management Process (CMP) document*.¹ All requests for changes to Qwest's systems or processes, including those requests from Qwest business units and the software release candidates originated by CLECs, necessitate the creation of a Change Request (CR). These issues are logged into Qwest's internal database for tracking purposes. In order to enter change items into this database, several pieces of information are required, such as the type of change (category), associated working project (software life cycle), severity level (importance and scope), and priority (significance and timeframe).

¹ The *CMP Document* defines the processes through which CLECs submit Change Requests and received Qwest Release Notifications. It is located at http://www.qwest.com/wholesale/downloads/2001/010514/CMP_Document_051401.doc.



ROC Observation & Exception Formal Response

As part of the relationship management process testing evaluation, KPMG Consulting reviewed four internal Qwest documents that outline the processes for managing CRs². The document titles are as follows:

- *Interconnect Mediated Access (IMA) Change Management Plan.*³
- *EDI Development Change Request (CR) Process.*⁴
- *Interconnect Center of Excellence (ICOE) Basic Classifications of Distributed Defect Tracking System (DDTS) CRs.*⁵
- *Interconnect Mediated Access (IMA) Process Description & Specification, Change Request (CR) Process.*⁶

Issues:

While the documents contain large portions of similar information, inconsistencies such as important definitions for CR types, categories, and database fields exist. For example, there is a variation between the number of DDTS project categories. Similarly, two documents refer to five types of CRs, while two other documents add a sixth type.

Other findings in the documents included the following:

- The documents lack essential information (i.e. date of publication, version, author, change log, assumptions) that may be used to reference their source and applicability.
- The codes and abbreviations are presented without clear definitions.
- The process descriptions and process flows are either missing or contain ambiguous information.
- The process definitions for handling CRs and communicating prioritization changes to stakeholders appear to be incomplete.

KPMG Consulting has provided examples of the issues revealed in this observation in a separate, confidential document.

Questions:

1. Is there a reason why the Qwest documents contain different information about similar topics?
2. Which document(s) does Qwest use to represent its change management process?
3. Please describe how Qwest moves issues (i.e. bug fixes, requirement gaps, system enhancements) relevant to CLECs through all phases of the Change Management Process.

Qwest Formal Response to OBS 3044 (11/15/2001):

This Observation was written to address inconsistencies in documentation with regards to the handling of Change Requests. The internal documents the P-CLEC referenced are:

1. Interconnect Mediated Access Change Management Plan (IMA CMP).
2. EDI Development Change Request (CR) Process.
3. Interconnect Mediated Access (IMA) Basic Classifications of Distributed Defect Tracking System (DDTS) CRs.

² These documents are deemed by Qwest to be "Confidential" in nature, and as agreed upon in the MTP, specific information regarding their contents will not be publicly revealed.

³ Document dated January 2001, Version 1b

⁴ Document date and version number not provided

⁵ Document dated February 28, 2001, Draft 00.05

⁶ Document dated December 1, 2000, Version 00.03



4. Interconnect Mediated Access (IMA) Process Description & Specification, Change Request (CR) Process

The IMA CMP document is being enhanced and will absorb the information that was previously contained in the IMA Basic Classifications of DDTS CRs and the Interconnect Mediated Access (IMA) Process Description & Specification, Change Request (CR) Process document. Integrating these two documents into the IMA CMP will result in the ability to reference a single, comprehensive document and become the focal point for uniform standards for DDTS usage in IMA.

The inconsistent findings that were noted in the 'Issues' section of this Test Incident are noted and understood. The updated IMA CMP will focus on the following procedures:

- version control to maintain essential information
- definition of any codes and/or abbreviations
- where needed, concise process descriptions and flows will be available
- complete definitions and communication methods regarding the Change Request process

The EDI Development Change Request (CR) Process, has been re-located. This information may now be found in Chapter 17 of the EDI Development Handbook. A cross reference to the EDI development CR process will also be included in the IMA CMP.

I. Is there a reason why the Qwest documents contain different information about similar topics?

Yes, these documents differ in scope, content, are written at different levels and utilized by different groups. They also have since evolved into more comprehensive documents.

1.1. Interconnect Mediated Access (IMA) Change Management Plan (IMA CMP)

The IMA CMP is the main source of information and reflects current change management flow. It defines the steps to follow in the day to day administration of change management processes. This document will be updated to reflect planned changes to the change management flow and will remove inconsistencies mentioned in this TI. The updated IMA CMP will contain a reference to the EDI Development CR process, now found in Chapter 17 of the EDI Developers Handbook.

1.2. EDI Development Change Request (CR) Process

This information is now found in Chapter 17 of the EDI Developers Handbook, and will reference the IMA CMP for a broader view of the Change Request process.

This document focuses on EDI development processes and is a subset of the IMA CMP document that references CR categories and types.

For instance, the EDI Development CR Process references 25 CR categories, where the IMA CMP references 31 categories. This discrepancy is due to EDI developers using a subset of the categories found in the IMA CMP. Different subsets exist because development groups follow their own developmental analysis prior to handing their CRs to the larger IMA CR process. The IMA CR process, as identified in the IMA CMP, is then followed.

1.3. Interconnect Mediated Access (IMA) Basic Classifications of Distributed Defect Tracking System (DDTS) CRs

The IMA Basic Classifications of DDTS CRs is a document currently being used in tandem with the current version of the IMA CMP document and will be incorporated into the IMA CMP. The IMA Basic Classifications of DDTS CRs is scheduled to be retired on December 1, 2001.

1.4. Interconnect Mediated Access (IMA) Process Description & Specification, Change Request (CR) Process

This document was in a draft form in July of this year and was being used by the IMA System Test organization. Qwest has since decided to incorporate that information into the IMA CMP. The processes referenced in it were equivalent processes referenced in the IMA CMP. The IMA Process



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Description & Specification, Change Request (CR) Process is scheduled to be retired on December 1, 2001.

2. Which document(s) does Qwest use to represent its change management process?

Qwest IMA refers to the IMA Change Management Plan. This document is currently being updated to reflect current change management flow. Until this document has been completed, Qwest IMA refers to the current IMA CMP in conjunction with the Interconnect Mediated Access (IMA) Basic Classifications of Distributed Defect Tracking System (DDTS) CRs.

3. Please describe how Qwest moves issues (i.e., bug fixes, requirement gaps, system enhancements) relevant to CLECs through all phases of the Change Management Process.

The steps that CLECs employ are found at the Wholesale System web-site found at <http://www.qwest.com/wholesale/cmp/whatiscmp.html>. Once the Change Request has been initiated by the CLEC, the steps utilized by Qwest IMA are detailed in the current version of IMA CMP (and will also be incorporated in the updated version). They are provided below for your reference:

All bug fixes, requirement gaps and enhancements follow the same lifecycle.

1. The author / representative of the fix, requirement gap or enhancement creates a Change Request that outlines the issue at hand.
2. The CR is recommended for a Release or a Patch.
3. Preliminary effort estimates are prepared.
4. The CR is fully defined.
5. The effort estimate to fully implement the CR is developed.
6. The CR is reviewed and approved to be included in:
 - 6.1. the initial Packaging of a Release
 - 6.2. added to a Release in Progress
 - 6.3. deployed as a Production Patch

In summary, the following documents have been addressed:

1. Updated Interconnect Mediated Access Change Management Plan (IMA CMP). Since this document reflects an internal process, it will be sent to the P-CLEC via the Confidential Information Data Request process on December 1, 2001.
2. Interconnect Mediated Access (IMA) Basic Classifications of Distributed Defect Tracking System (DDTS) CRs will be retired on December 1, 2001. Since this document is an internal document, a Notification regarding its retirement will not be published to the CLEC community.
3. Interconnect Mediated Access (IMA) Process Description & Specification, Change Request (CR) Process will be retired on December 1, 2001. Since this document is an internal document, a Notification regarding its retirement will not be published to the CLEC community.
4. The information found in the EDI Development Change Request (CR) Process, now located in Chapter 17 of the EDI Developers Handbook. The EDI Development Handbook is an internal document, and will be sent to the P-CLEC via the Confidential Information Data Request process on December 1, 2001.

Qwest First Supplemental Response OBS 3044 (11/29/2001):

In Qwest's previous response dated 11/15/01, the summary section stated that the updated Interconnect Mediated Access Change Management Plan (IMA CMP) and the EDI Developers Handbook would be sent



to the P-CLEC⁷ on December 1, 2001. Since this falls on a Saturday, Qwest will send the document via the Confidential Information Data Request process on Monday, December 3, 2001.

Qwest Second Supplemental Response OBS 3044 (12/04/2001):

Qwest indicated in the 11/15/01 response that the following documents would be retired on 12/1/01:

- *Interconnect Mediated Access (IMA) Basic Classifications of Distributed Defect Tracking System (DDTS) CRs*
- *Interconnect Mediated Access (IMA) Process Description & Specification, Change Request (CR) Process*

Both documents were retired on 12/1/01. As was mentioned in the 11/15/01 response, no notification of the retirement was issued to the CLEC community because both documents were internal to Qwest.

In addition, Qwest indicated that two documents would be provided to KPMG via the DR process:

- *The Interconnect Mediated Access Change Management Plan (IMA CMP) will be provided via data request CM25 by 12/4/01.*
- *The EDI Developers Handbook (including the EDI Development Change Request (CR) Process) was provided via data request CM26 on 11/30/01.*

KPMG Comments to OBS 3044 (12/17/2001):

KPMG Consulting reviewed Qwest's responses, and noted the following issues with Qwest documents:

IMA CMP

KPMG Consulting acknowledges the enhancement of the *IMA CMP* to absorb the information that was previously contained in *IMA Basic Classifications of DDTS CR* and the *IMA Process Description & Specification CR Process*, as well as the retirement of the latter two documents. A single and comprehensive document is designed to enhance Qwest's ability to develop uniform processes. In its formal response, Qwest stated that the observation issues were noted and understood⁸. However, KPMG Consulting identified the following inconsistencies in the latest Version 1.00 of *IMA CMP*, dated November 30, 2001⁹. For illustration purpose, we are providing an example associated with each issue, where applicable:

1. Version control does not reflect previous version 1a and 1b¹⁰.
2. The document lacks a change log to document the changes made since version 1b.
3. The Table of Contents reflects incorrect page number references. For example, IMA Change Request Life Cycle starts on page 5, not on page 6, as indicated.
4. The Table of Figures references figures that do not exist. For example, the document does not include the diagram Consolidated Change Request Flow (Figure 1.1).
5. Definitions of certain codes and abbreviations, e.g., PCB, BAP, SCM, PMO, FOM, and BPL, are missing¹¹.

⁷ This should read KPMG Consulting instead of P-CLEC.

⁸ Qwest quote in 4th paragraph of formal response (see page 3 in this document).

⁹ Qwest Quote: "IMA CMP is the main source of information and reflects current change management flow. It defines steps to follow in the day to day administration of change management processes. This document will be updated to reflect planned changes to the change management flow and will remove inconsistencies mentioned in this TI".

¹⁰ Qwest quote: "The updated IMA CMP will focus on the following procedures...version control to maintain essential information". The latest version presented to KPMG Consulting following version 1b was version 1.00.



6. The document excludes essential change management process information¹². Specifically:
 - The document lacks complete communications methods, and omits intervals for notifications, escalations, prioritization, restoration, and documentation updates. For example, no timeline for announcing CR prioritization or changes to a CR status is provided¹³.
 - The document lacks process flows. For example, no process flow for production support or CR prioritization is presented¹⁴.
 - The document lacks entry and exit criteria for processes.
 - The document does not address Testing Support and changes to test environments. For example, testing roles and responsibilities, as well as trouble escalation procedures for testing of new interfaces or new interface releases, are missing.
 - The document does not describe what tools are used to effectively manage change requests and trouble tickets.
7. The document does not address the last three issues identified in the "Confidential Information" section of KPMG Consulting's initial observation report. Qwest neither responded to these issues, nor incorporated document revisions to address them.

KPMG Consulting acknowledges the current CMP re-design process, the effort that Qwest and CLECs have initiated, and the timeline that has been established to conclude the re-design efforts. However, KPMG Consulting cannot validate that changes were made to Qwest internal documentation to reflect or identify issues discussed and documented in the current redline CMP document¹⁵.

KPMG Consulting would expect that, in order to accommodate changes in operations, and to include points of interaction with the CLEC community, current Qwest documents include, at a minimum, the various CLEC touch-points at which the internal OSS interface change management process interacts with the external change management process that is undergoing restructuring. If, as Qwest has stated, the current *IMA CMP* document is the main source of information, and reflects current change management flow¹⁶, then the following processes do not appear to be adequately documented:

- Notification procedures, including intervals;
- Escalation procedures, including intervals;
- Restoration procedures, including intervals;
- Prioritization procedures, including intervals;
- Documentation Management procedures, including intervals;
- Production Support procedures, including intervals;
- Major release and point release procedures; and
- Testing procedures, including test environments.

¹¹ Qwest quote: "The updated IMA CMP will focus on the following procedures...definition of any codes and/or abbreviations".

¹² Qwest quote: "Integrating these two documents into the IMA CMP will result in the ability to reference a single, comprehensive document and become the focal point for uniform standards for the DDTS usage in IMA".

¹³ Qwest quote: "The updated IMA CMP will focus on the following procedures...complete definitions and communication methods regarding the CR process".

¹⁴ Qwest quote: "The updated IMA CMP will focus on the following procedures...where needed, concise process description and flows will be provided".

¹⁵ The current Draft CMP can be found at <http://www.qwest.com/wholesale/cmp/redesign.html> under the heading "Re-design Documentation."

¹⁶ Qwest quote in section 1.1 of formal response (see page 3 in this document).



EDI Developer's Handbook

KPMG Consulting acknowledges Qwest's incorporation of the *Development CR Process* into chapter 17 of the *EDI Developer's Handbook*. A single and comprehensive document is designed to enhance Qwest's ability to develop uniform processes. However, the document does not demonstrate how Qwest consistently integrates CLEC-initiated CRs with Qwest internal CRs. Based on a review of this document, it appears that Qwest conducts the CR categorization, prioritization, and approval processes without CLEC input.

The Qwest Change Management Process (CMP) is the process by which CLECs initiate updates and enhancements to Qwest OSS interfaces. The process document in question, as indicated by Qwest's response, "is the main source of information" and "defines the steps to follow in the day to day administration" of the Qwest internal OSS change management process. It is critical that the internal OSS change management process be clearly documented and well formed for the management and implementation of changes requested by CLECs. In the absence of a framework to evaluate, categorize, and prioritize proposed changes, there is no assurance that Qwest OSS functionalities are enhanced to consistently meet the needs of CLEC business operations.

Qwest Formal Response to EXP 3102 (12/28/2001):

Qwest has provided the IMA Change Management Plan and the IMA EDI Developer's Handbook in response to Exception 3102. These documents define processes and procedures internal to the Interconnect Mediated Access (IMA) system. The scope of these documents is limited to the management of changes within IMA. All interaction between Qwest and CLECs, including CLEC initiated Change Requests (CRs) and trouble tickets, prioritization of CRs, communication of status, etc., is defined and managed through the Qwest Wholesale CMP and is beyond the scope of the IMA documents in question.

Qwest will, however, address KPMG's comments (items 1 through 5 and item 6, bullet points 3 and 5 above) specific to the IMA CMP.

As the issues in items 6 (bullet points 1, 2, and 4) and 7 are beyond the scope of the IMA documents in question, Qwest will indicate the appropriate Wholesale CMP documents and processes that address KPMG's concerns.

The following is Qwest's response to KPMG comments specific to IMA documents. Qwest's response is outlined below, with KPMG's statements in italics:

1. *Version control does not reflect previous version 1a and 1b¹⁷.*

Qwest Response: The previous IMA CMP versions (1a and 1b) were never baselined or approved, therefore no reference to unapproved versions are necessary in the Document History of this new Baselined Version 01.00.00 dated November 30, 2001.

2. *The document lacks a change log to document the changes made since version 1b.*

Qwest Response: The previous IMA CMP versions (1a and 1b) were never baselined or approved, therefore no reference to unapproved versions are necessary in the Document History of this new Baselined Version 01.00.00. Subsequent changes will be logged in the Document History on page 2.

¹⁷ Qwest quote: "The updated IMA CMP will focus on the following procedures...version control to maintain essential information". The latest version presented to KPMG Consulting following version 1b was version 1.00.

3. *The Table of Contents reflects incorrect page number references. For example, IMA Change Request Life Cycle starts on page 5, not on page 6, as indicated.*

Qwest Response: Using the "Office 97" version of MS Word to open the subject document, the IMA Change Request Life Cycle starts on page 6, as indicated in the Table of Contents.

4. *The Table of Figures references figures that do not exist. For example, the document does not include the diagram Consolidated Change Request Flow (Figure 1.1).*

Qwest Response: All figures in the Table of Figures exist and are present in the document. In some versions of MS Word, the Visio application requires the user to click into the area where the imported diagram resides. Qwest will provide a separate copy of Figure 1.1 via the normal data request process.

5. *Definitions of certain codes and abbreviations, e.g., PCB, BAP, SCM, PMO, FOM, and BPL, are missing¹⁸.*

Qwest Response: These will be added to the IMA CMP, Section 8, Definition of Terms, by January 11, 2002.

6. *The document excludes essential change management process information¹⁹. Specifically:*

- The document lacks entry and exit criteria for processes.*

Qwest Response: Entry and exit criteria are provided in documented processes. Since the IMA CMP is a plan, it does not provide that level of detail. An example of a documented process is the document identified as the seventh reference and titled, "System Test CR Verification Procedure". Qwest will provide a copy of this document via the normal data request process.

- The document does not describe what tools are used to effectively manage change requests and trouble tickets.*

Qwest Response: DDTS is the tool used to manage change requests. The "ClearDDTS Users Guide" is the first document indicated under References, cited in Section 8, Definition of Terms, under "DDTS". The "Creation and Administration of Process-related DDTS Change Requests Process" is the fifth Reference, which is cited in Section 2.g.6 in the body of the IMA CMP. Change requests logged in DDTS include a reference to trouble tickets where appropriate. Trouble tickets are initiated by the Wholesale Systems Help Desk and managed in Problem Change Request Management (PCRM).

7. *The document does not address the last three issues identified in the "Confidential Information" section of KPMG Consulting's initial observation report. Qwest neither responded to these issues, nor incorporated document revisions to address them.*

Qwest Response: These issues targeted the old, non-baselined version 1b of the IMA CMP, and have been resolved in the new baselined IMA CMP version 01.00.00. Qwest further responds to Item #7 in Confidential Attachment A.

The following is Qwest's response to KPMG comments specific to the Wholesale CMP process. Qwest's response is outlined below, with KPMG's statements in italics:

6. *The document excludes essential change management process information²⁰. Specifically:*

¹⁸ Qwest quote: "The updated IMA CMP will focus on the following procedures...definition of any codes and/or abbreviations".

¹⁹ Qwest quote: "Integrating these two documents into the IMA CMP will result in the ability to reference a single, comprehensive document and become the focal point for uniform standards for the DDTS usage in IMA".

²⁰ Qwest quote: "Integrating these two documents into the IMA CMP will result in the ability to reference a single, comprehensive document and become the focal point for uniform standards for the DDTS usage in IMA".



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- *The document lacks complete communications methods, and omits intervals for notifications, escalations, prioritization, restoration, and documentation updates. For example, no timeline for announcing CR prioritization or changes to a CR status is provided²¹.*

Qwest Response: The change management process is defined by Wholesale CMP process and described in the Wholesale CMP documents "Changes To Existing OSS Interfaces" and "Qwest Proposed CR Prioritization Language" (Attachments B and C). The Wholesale CMP process (not the IMA Change Management Plan) defines this process.

- *The document lacks process flows. For example, no process flow for production support or CR prioritization is presented²².*

Qwest Response: Qwest and the CLECs are currently negotiating the Wholesale CMP redesign. Qwest anticipates that this effort will be completed by January 31, 2002. This date is tentative and is dependent on satisfactory participation and cooperation of the CLECs. Qwest will complete a Wholesale CMP Methods and Procedures document approximately 30 days after the completed Wholesale CMP redesign. The Methods and Procedures document will include the process flows cited by KPMG as missing.

- *The document does not address Testing Support and changes to test environments. For example, testing roles and responsibilities, as well as trouble escalation procedures for testing of new interfaces or new interface releases, are missing.*

Qwest Response: Testing is addressed in the Wholesale CMP document "Changes To Existing OSS Interfaces", Section I (Attachment B).

KPMG Consulting would expect that, in order to accommodate changes in operations, and to include points of interaction with the CLEC community, current Qwest documents include, at a minimum, the various CLEC touch-points at which the internal OSS interface change management process interacts with the external change management process that is undergoing restructuring. If, as Qwest has stated, the current IMA CMP document is the main source of information, and reflects current change management flow²³, then the following processes do not appear to be adequately documented:

Qwest Response: Due to the tentative process adopted in the CMP, the CMP process is the main source of information and not the IMA CMP.

EDI Developer's Handbook

KPMG Consulting acknowledges Qwest's incorporation of the Development CR Process into chapter 17 of the EDI Developer's Handbook. A single and comprehensive document is designed to enhance Qwest's ability to develop uniform processes. However, the document does not demonstrate how Qwest consistently integrates CLEC-initiated CRs with Qwest internal CRs. Based on a review of this document, it appears that Qwest conducts the CR categorization, prioritization, and approval processes without CLEC input.

Qwest Response: The EDI Developer's Handbook is an internal document referenced in the IMA Change Management Plan (CMP). It is not intended to involve direct CLEC input, which occurs at the Wholesale and IMA levels, as indicated in the Qwest Wholesale Change Management Process, cited in the Scope of the IMA CMP and again in Section 6, OSS Supplier Change Request (CR) Management.

²¹ Qwest quote: "The updated IMA CMP will focus on the following procedures...complete definitions and communication methods regarding the CR process".

²² Qwest quote: "The updated IMA CMP will focus on the following procedures...where needed, concise process description and flows will be provided".

²³ Qwest quote in section I.1 of formal response (see page 3 in this document).



Qwest Supplemental Response to EXP 3102 (01/14/2002):

Qwest committed to the following action item in the 12/28/01 response, under issue #5:

"[KPMG Comments] Definitions of certain codes and abbreviations, e.g., PCB, BAP, SCM, PMO, FOM, and BPL, are missing²⁴.

[Qwest Response] These will be added to the IMA CMP, Section 8, Definition of Terms, by January 11, 2002."

Qwest completed the updates to the *IMA Change Management Plan* on 1/7/02. Qwest will provide KPMG the updated document via the data request process by 1/15/02 (DR # TI-777S1 – EXP 3102).

KPMG Comments to EXP 3102 (01/16/2002):

KPMG Consulting reviewed Qwest's response, along with information provided in relation to the confidential portion of this report. KPMG Consulting's response is comprised of two parts, a process review and a documentation review. The confidential portion of the documentation review includes Attachment A, submitted to Qwest separately through the data request process.

OSS Interface Change Management Process Review

KPMG Consulting recognizes Qwest's position that the scope of the IMA Change Management Plan and the IMA EDI Developer's Handbook is limited to the processes and procedures internal to the Interconnect Mediated Access (IMA) system. Qwest draws a distinction between the Wholesale Change Management Process (CMP) that is currently undergoing redesign, and the internal processes that are used to manage IMA changes within Qwest. Qwest identified the specific issues (four of the eleven total) raised in KPMG Consulting's first response that it considers out of scope for the *IMA CMP* document. Qwest did, however, provide a response to all of KPMG Consulting's comments.

Although KPMG Consulting agrees that the internal process is not the main focus of the OSS Change Management Test, it contends that the test scope should include an analysis of how Qwest formally applies changes to OSS interfaces, including IMA for EDI and GUI. By definition, the management of changes to IMA involves the Change Management Process. KPMG Consulting does not agree that the two change processes (i.e., internal and external) can be considered independently, but instead maintains that they should be adequately integrated and include consistent sub-processes.

The January 17, 2002 Systems CMP Team Meeting Distribution Package²⁵ contains references to multiple IMA Change Requests initiated by CLECs and Qwest. IMA continues to be the primary vehicle or interface system by which CLECs submit their pre-orders and orders to Qwest. Therefore, KPMG Consulting believes that the adequacy of the methods by which Qwest's internal process is documented and operated, especially within the context of both CLEC-initiated and Qwest-initiated changes, has direct relevance to how these changes are managed for the external, Wholesale CMP. The nature of KPMG Consulting's end-to-end testing is such that it does, at times, require a review of business processes internal to Qwest, but impacting to certain wholesale processes, such as Change Management.

²⁴ Qwest quote: "The updated IMA CMP will focus on the following procedures...definition of any codes and/or abbreviations".

²⁵ Available at Qwest Wholesale Web site at the following URL:

<http://www.qwest.com/wholesale/downloads/2002/020111/ProductProcessJanDistPackage.pdf>



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If, as Qwest has stated, the current IMA CMP document is the “main source of information,” and reflects current change management flow²⁶, KPMG Consulting contends that the following processes remain inadequately documented:

- a. Notification procedures, including intervals;
- b. Escalation procedures, including intervals;
- c. Restoration procedures, including intervals;
- d. Prioritization procedures, including intervals;
- e. Documentation Management procedures, including intervals;
- f. Production Support procedures, including intervals;
- g. Major release and point release procedures; and
- h. Testing procedures, including test environments.

IMA CMP Documentation Review

Version control does not reflect previous version 1a and 1b.²⁷

In its November 15, 2001 response, Qwest indicated that the *IMA CMP* document was to be enhanced, and would focus on version control to maintain essential information. In its December 28, 2001 response, Qwest stated that the *IMA CMP* versions (1a and 1b) had not been base-lined or approved and, therefore, would require no updates to the Document History. KPMG Consulting requests that Qwest provide a description of the steps taken to ensure document management controls for non base-lined and unapproved versions of *IMA CMP*, if such sub-processes exist. This request notwithstanding, KPMG Consulting maintains that this example represents a relatively insignificant problem related to documentation. As part of its retest, KPMG Consulting will review Qwest's January 15, 2002 version of the *IMA CMP* for version control.

The document lacks a change log to document the changes made since version 1b.

In its response, Qwest stated that the previous *IMA CMP* versions (1a and 1b) had not been base-lined or approved. KPMG Consulting would expect that future IMA documents clearly indicate whether or not they have been approved as official baselined documents.

The Table of Contents reflects incorrect page number references. For example, IMA Change Request Life Cycle starts on page 5, not on page 6, as indicated.

In its response, Qwest stated that the document displayed correct page numbers with a particular version of MS Word. KPMG Consulting reviewed the revised hard copy and electronic versions of the document, and concludes that this issue is resolved.

The Table of Figures references figures that do not exist. For example, the document does not include the diagram, Consolidated Change Request Flow (Figure 1.1).

In its response, Qwest stated that figures were present in the document, and that in some versions of MS Word, diagrams prepared with Visio do not display correctly. KPMG Consulting confirms receipt of Figure 1.1 on December 31, 2001, and receipt of the *IMA CMP* document on January 15, 2002. KPMG Consulting has determined that flowcharts are referenced appropriately, and can be read using Microsoft Word for Windows 2000 to view the displays. This issue is resolved.

²⁶ Qwest quote in section 1.1 of formal response (see page 3 of this document).

²⁷ Qwest quote: “The updated IMA CMP will focus on the following procedures...version control to maintain essential information.” The subsequent version presented to KPMG Consulting following version 1b was version 1.00.



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Definitions of certain codes and abbreviations, e.g., PCB, BAP, SCM, PMO, FOM, and BPL, are missing²⁸.

In its response, Qwest stated that the revised *IMA CMP* document would include relevant definitions for the above terms. KPMG Consulting will review the revised document for descriptions of these and any new acronyms included in the document. (Qwest provided this document to KPMG Consulting on January 15, 2002).

The document excludes essential change management process information,²⁹ specifically:

The document lacks entry and exit criteria for processes.

In its response, Qwest stated that entry/exit criteria are included in documented processes (e.g., *System Test CR Verification Procedure*), but not in any of the documented plans (e.g., *IMA CMP*). KPMG Consulting confirms the receipt of the *System Test CR Verification Procedure* document on December 31, 2001. KPMG Consulting would expect to observe consistent definitions and levels of detail, across different document types, to support critical wholesale functions, such as how Qwest verifies and validates change requests for further processing and consideration. KPMG Consulting will review the *System Test CR Verification Procedure* document, along with the revised *IMA CMP* document, for entry and exit criteria.

The document does not describe what tools are used to effectively manage change requests and trouble tickets.

In its response, Qwest stated that DDTS is the tool used to manage change requests. The DDTS tool is documented in the *ClearDDTS Users Guide*. For Trouble Ticket management, Qwest uses PCRM, which is documented in *PCRM Description* document (DR ID147). KPMG Consulting requests that Qwest provide updated documentation for both applications (DDTS and PCRM) that document the processes, roles and responsibilities, and the manner in which the applications support CLECs. KPMG Consulting requests documentation that defines how Qwest processes (for Change Request Management and Trouble Ticket Management) support the integration of the Wholesale CMP with the Wholesale System Help Desk (WSHD) and other CLEC touch-points within the Qwest organization. Such documentation might include current process descriptions, roles and responsibilities, and how, specifically, the application supports Qwest in operating Change Management.

The document lacks complete communications methods, and omits intervals for notifications, escalations, prioritization, restoration, and documentation updates. For example, no timeline for announcing CR prioritization or changes to a CR status is provided.³⁰

In its response, Qwest stated that the *Wholesale CMP* process, which is undergoing revision by Qwest and CLECs, would specify the above processes and procedures. KPMG Consulting was unable to validate these processes on the basis of proposed CMP language, yet to be approved by CLECs and implemented within Qwest.

The document lacks process flows. For example, no process flow for production support or CR prioritization is presented.³¹

In its response, Qwest stated that it would complete a *Wholesale CMP Methods and Procedures* document within one month after the completion of CMP Redesign, and that the redesign effort is anticipated to be completed by January 31, 2002. KPMG Consulting understands that redesign meetings are scheduled at

²⁸ Qwest quote: "The updated IMA CMP will focus on the following procedures...definition of any codes and/or abbreviations."

²⁹ Qwest quote: "Integrating these two documents into the IMA CMP will result in the ability to reference a single, comprehensive document and become the focal point for uniform standards for the DDTS usage in IMA."

³⁰ Qwest quote: "The updated IMA CMP will focus on the following procedures...complete definitions and communication methods regarding the CR process."

³¹ Qwest quote: "The updated IMA CMP will focus on the following procedures...where needed, concise process description and flows will be provided."



least through April 2002, but will review the *Wholesale CMP Methods and Procedures* document when it becomes available.

The document does not address Testing Support and changes to test environments. For example, testing roles and responsibilities, as well as trouble escalation procedures for testing of new interfaces or new interface releases, are missing.

In its response, Qwest stated that the *Wholesale CMP* process, which is undergoing revision by Qwest and CLECs, would specify the above processes and procedures. KPMG Consulting was unable to validate these processes on the basis of proposed CMP language, yet to be approved by CLECs and implemented within Qwest. This issue remains open until the above processes and procedures can be fully tested.

The document does not address the last three issues identified in the "Confidential Information" section of KPMG Consulting's initial observation report. Qwest neither responded to these issues, nor incorporated document revisions to address them.

Refer to confidential Attachment A for KPMG Consulting comments related to the documentation review.

EDI Developer's Handbook Document Review

In its response, Qwest stated that the *EDI Developer's Handbook* is an internal document, referenced in the *IMA CMP*, which does not involve direct CLEC input. This, according to Qwest, occurs at the *Wholesale CMP* and *IMA CMP* levels. Although KPMG Consulting recognizes the purpose of the referenced handbook, it requests that Qwest demonstrate and document the steps taken to ensure that Qwest-initiated, CLEC-impacting CRs are visible to CLECs. Likewise, Qwest has not yet provided a full description of the framework that Qwest uses internally to apply changes to the IMA interface with CLEC input. For example, CLEC input is required during CR prioritization and CR packaging for IMA releases. Qwest and CLECs are currently collaborating to define the details of this interaction in the CMP Redesign Workshops.

KPMG Consulting requests that Qwest submit the revised *EDI Developer's Handbook* document for review. This issue is unresolved.

KPMG Consulting recommends that Exception 3102 remain open pending resolution of the issues identified above, as well as those identified in Attachment A.

Qwest Response to KPMG Comments for EXP 3102 (01/25/2002):

Qwest reviewed KPMG Consulting's 01/16/02 response to Exception 3102. Qwest's response is outlined below, with KPMG's statements in italics:

OSS Interface Change Management Process Review

If, as Qwest has stated, the current IMA CMP document is the "main source of information," and reflects current change management flow," KPMG Consulting contends that the following processes remain inadequately documented:

- a. *Notification procedures, including intervals;*
- b. *Escalation procedures, including intervals;*
- c. *Restoration procedures, including intervals;*
- d. *Prioritization procedures, including intervals;*
- e. *Documentation Management procedures, including intervals;*
- f. *Production Support procedures, including intervals;*
- g. *Major release and point release procedures; and*
- h. *Testing procedures, including test environments.*



ROC Observation & Exception Formal Response

Qwest Response: As an initial matter, Qwest wishes to clarify a possible misunderstanding. In the comments above, KPMG Consulting referenced the statement made in Qwest's 11/15/01 formal response, "The IMA CMP document is the main source of information and reflects current change management flow". This statement was made in response to questions about four specific IMA documents. In its 12/17/01 response, KPMG Consulting discussed interaction with the CLEC community and CLEC touch points and questioned adequate documentation of the eight processes above. In the context of change management as it relates to CLECs, it is the external Wholesale CMP and not the internal IMA CMP that defines Qwest's processes for supporting CLECs.

Second, to address concerns identified in KPMG's "OSS Change Management Interface Process Review", Qwest stresses that the external Wholesale CMP drives Qwest's internal system processes. Thus, internal documentation that integrates Qwest's internal processes with external CMP processes is dependent, to a large extent, on the external CMP documentation being in place. As KPMG is aware, the external systems CMP Redesign will soon be complete. Since KPMG Consulting would like Qwest to demonstrate a documented integration of external (CLEC facing) and internal change management processes, Qwest will provide a document to KPMG Consulting that defines the existing integration of external and internal processes by February 7, 2002.

IMA CMP Documentation Review

1. *Version control does not reflect previous version 1a and 1b.*

In its November 15, 2001 response, Qwest indicated that the IMA CMP document was to be enhanced, and would focus on version control to maintain essential information. In its December 28, 2001 response, Qwest stated that the IMA CMP versions (1a and 1b) had not been base-lined or approved and, therefore, would require no updates to the Document History. KPMG Consulting requests that Qwest provide a description of the steps taken to ensure document management controls for non base-lined and unapproved versions of IMA CMP, if such sub-processes exist. This request notwithstanding, KPMG Consulting maintains that this example represents a relatively insignificant problem related to documentation. As part of its retest, KPMG Consulting will review Qwest's January 15, 2002 version of the IMA CMP for version control.

Qwest Response: Working documents, prior to baselining, are version controlled in the IMA Document Repository, located on the local area network. Working documents contain a document change log, which records the revision history. Once the document is baselined, the revision history of the working document is deleted.

2. *The document lacks a change log to document the changes made since version 1b.*

In its response, Qwest stated that the previous IMA CMP versions (1a and 1b) had not been base-lined or approved. KPMG Consulting would expect that future IMA documents clearly indicate whether or not they have been approved as official baselined documents.

Qwest Response: Future IMA documents will indicate whether or not they have been baselined and approved.

3. *The Table of Contents reflects incorrect page number references. For example, IMA Change Request Life Cycle starts on page 5, not on page 6, as indicated.*

In its response, Qwest stated that the document displayed correct page numbers with a particular version of MS Word. KPMG Consulting reviewed the revised hard copy and electronic versions of the document, and concludes that this issue is resolved.

Qwest Response: No Qwest action required.



ROC Observation & Exception Formal Response

4. *The Table of Figures references figures that do not exist. For example, the document does not include the diagram, Consolidated Change Request Flow (Figure 1.1).*

In its response, Qwest stated that figures were present in the document, and that in some versions of MS Word, diagrams prepared with Visio do not display correctly. KPMG Consulting confirms receipt of Figure 1.1 on December 31, 2001, and receipt of the IMA CMP document on January 15, 2002. KPMG Consulting has determined that flowcharts are referenced appropriately, and can be read using Microsoft Word for Windows 2000 to view the displays. This issue is resolved.

Qwest Response: No Qwest action required.

5. *Definitions of certain codes and abbreviations, e.g., PCB, BAP, SCM, PMO, FOM, and BPL, are missing.*

In its response, Qwest stated that the revised IMA CMP document would include relevant definitions for the above terms. KPMG Consulting will review the revised document for descriptions of these and any new acronyms included in the document. (Qwest provided this document to KPMG Consulting on January 15, 2002).

Qwest Response: No Qwest action required.

6. *The document excludes essential change management process information, specifically:*
(a) The document lacks entry and exit criteria for processes.

In its response, Qwest stated that entry/exit criteria are included in documented processes (e.g., System Test CR Verification Procedure), but not in any of the documented plans (e.g., IMA CMP). KPMG Consulting confirms the receipt of the System Test CR Verification Procedure document on December 31, 2001. KPMG Consulting would expect to observe consistent definitions and levels of detail, across different document types, to support critical wholesale functions, such as how Qwest verifies and validates change requests for further processing and consideration. KPMG Consulting will review the System Test CR Verification Procedure document, along with the revised IMA CMP document, for entry and exit criteria.

Qwest Response: No Qwest action required.

- (b) The document does not describe what tools are used to effectively manage change requests and trouble tickets.*

In its response, Qwest stated that DDTS is the tool used to manage change requests. The DDTS tool is documented in the ClearDDTS Users Guide. For Trouble Ticket management, Qwest uses PCRM, which is documented in PCRM Description document (DR ID147). KPMG Consulting requests that Qwest provide updated documentation for both applications (DDTS and PCRM) that document the processes, roles and responsibilities, and the manner in which the applications support CLECs. KPMG Consulting requests documentation that defines how Qwest processes (for Change Request Management and Trouble Ticket Management) support the integration of the Wholesale CMP with the Wholesale System Help Desk (WSHD) and other CLEC touch-points within the Qwest organization. Such documentation might include current process descriptions, roles and responsibilities, and how, specifically, the application supports Qwest in operating Change Management.

Qwest Response: Qwest will provide a response to this issue by February 7, 2002.

- (c) The document lacks complete communications methods, and omits intervals for notifications, escalations, prioritization, restoration, and documentation updates. For example, no timeline for announcing CR prioritization or changes to a CR status is provided.*

In its response, Qwest stated that the Wholesale CMP process, which is undergoing revision by Qwest and CLECs, would specify the above processes and procedures. KPMG Consulting was unable to validate these processes on the basis of proposed CMP language, yet to be approved by CLECs and implemented within Qwest.



ROC Observation & Exception Formal Response

Qwest Response: Qwest understands that KPMG will review the above processes and procedures upon completion of the systems portion of the CMP Redesign. The systems portion of the CMP Redesign effort is anticipated to be completed by January 24, 2002.

(d) The document lacks process flows. For example, no process flow for production support or CR prioritization is presented.

In its response, Qwest stated that it would complete a Wholesale CMP Methods and Procedures document within one month after the completion of CMP Redesign, and that the redesign effort is anticipated to be completed by January 31, 2002. KPMG Consulting understands that redesign meetings are scheduled at least through April 2002, but will review the Wholesale CMP Methods and Procedures document when it becomes available.

Qwest Response: Qwest understands that KPMG will review the Wholesale CMP Methods and Procedures document, to be completed by Qwest within one month after the completion of the systems portion of the CMP Redesign. The systems portion of the CMP Redesign is anticipated to be completed by January 24, 2002.

(e) The document does not address Testing Support and changes to test environments. For example, testing roles and responsibilities, as well as trouble escalation procedures for testing of new interfaces or new interface releases, are missing.

In its response, Qwest stated that the Wholesale CMP process, which is undergoing revision by Qwest and CLECs, would specify the above processes and procedures. KPMG Consulting was unable to validate these processes on the basis of proposed CMP language, yet to be approved by CLECs and implemented within Qwest. This issue remains open until the above processes and procedures can be fully tested.

Qwest Response: Qwest understands that KPMG will review the above processes and procedures upon completion of the systems portion of the CMP Redesign. The systems portion of the CMP Redesign effort is anticipated to be completed by January 24, 2002.

7. *The document does not address the last three issues identified in the "Confidential Information" section of KPMG Consulting's initial observation report. Qwest neither responded to these issues, nor incorporated document revisions to address them.*

Refer to confidential Attachment A for KPMG Consulting comments related to the documentation review.

Qwest Response: To date, Qwest has not received confidential Attachment A, referenced on pages 12 and 16, and therefore is unable to further respond to these three issues.

EDI Developer's Handbook Document Review

In its response, Qwest stated that the EDI Developer's Handbook is an internal document, referenced in the IMA CMP, which does not involve direct CLEC input. This, according to Qwest, occurs at the Wholesale CMP and IMA CMP levels. Although KPMG Consulting recognizes the purpose of the referenced handbook, it requests that Qwest demonstrate and document the steps taken to ensure that Qwest-initiated, CLEC-impacting CRs are visible to CLECs. Likewise, Qwest has not yet provided a full description of the framework that Qwest uses internally to apply changes to the IMA interface with CLEC input. For example, CLEC input is required during CR prioritization and CR packaging for IMA releases. Qwest and CLECs are currently collaborating to define the details of this interaction in the CMP Redesign Workshops.

KPMG Consulting requests that Qwest submit the revised EDI Developer's Handbook document for review. This issue is unresolved.



ROC Observation & Exception Formal Response

Qwest Response: Section 6 of the IMA CMP directs IMA staff to the process for making CLEC-impacting CRs visible to CLECs. Section 5 of the IMA CMP provides the linkage to the EDI Developer Handbook.

Qwest Supplemental Response to KPMG Comments for EXP 3102 (02/07/2002):

In the January 25, 2002 response to KPMG comments, Qwest's response to the "OSS Interface Change Management Process Review", included a commitment to provide a document to KPMG Consulting that defines the existing integration of external and internal processes by February 7, 2002. This document is being provided via the usual data request process (DR no. TI-777S1).

In the January 25, 2002 response to KPMG comments, Qwest committed to respond to item 6(b) of the "IMA CMP Documentation Review" by February 7, 2002. Qwest's response is as follows:

ClearDDTS is a Rational Software product. The ClearDDTS Users Guide is Rational Software proprietary and can not be distributed by Qwest. ClearDDTS is a software enhancement and defect tracking tool used internally by Qwest to track the status of IMA CRs. ClearDDTS is used to support the efforts of Qwest personnel engaged in IMA development and production support and is not meant to support Qwest's relationship with CLECs.

In the "Proprietary Information" section of KPMG's January 22, 2002 response to Observation 3052 (TI 676), KPMG requested that Qwest provide additional information on the PCRM application. Qwest committed to provide this information in response to Observation 3052 (TI 676) by February 11, 2002. Qwest recommends that KPMG refer to the February 11, 2002 response to Observation 3052 (TI 676) to address the PCRM portion of item 6(b).

Qwest Supplemental Response (02/08/2002):

Qwest made the following commitment in the 1/25/02 response:

"Qwest will provide a document to KPMG Consulting that defines the existing integration of external and internal processes by February 7, 2002."

Qwest provided the *Wholesale CMP Integration Document* via data request # TI-777 S2 (E3102) on 2/8/02.

KPMG Supplemental Recommendation (02/11/2002):

As structured in previous responses to this Exception, KPMG Consulting's response is composed of two parts, a process review and a documentation review. KPMG Consulting sent Attachment A for this portion of the review to Qwest on January 30, 2002. There is no confidential portion included with this February 6, 2002 review. This Exception was the subject of discussion at an Observation and Exception focused call held on January 31, 2002.

OSS Interface Change Management Process Review

KPMG Consulting's position, that the internal and external change management processes are inter-related and should therefore be integrated with consistent and documented sub-processes, has not changed. KPMG Consulting believes that the formal management of changes applied to IMA EDI and IMA GUI involves the Wholesale Change Management Process, whether the change originates internally from Qwest or externally from CLECs.



KPMG Consulting interprets Qwest's clarification about the IMA CMP statement from a previous response³² to mean that this may have been a misstatement or that the original statement may have been taken out of context. Regardless, Qwest has reiterated the point that it is the external Wholesale CMP, and not the internal IMA CMP, that defines Qwest's processes for supporting CLECs. Qwest also stressed in its response that the external Wholesale CMP drives Qwest's internal system processes, including the IMA CMP. Thus, KPMG Consulting expects that internal documentation such as the IMA CMP or the new integration document include details about the sub-processes listed in reference items (a) through (h). KPMG Consulting will review the document that defines the integration of external and internal processes when it becomes available.

IMA CMP Documentation Review

1. Version control does not reflect previous version 1a and 1b.

Qwest Response: Working documents, prior to baselining, are version controlled in the IMA Document Repository, located on the local area network. Working documents contain a document change log, which records the revision history. Once the document is baselined, the revision history of the working document is deleted.

KPMG Consulting reviewed Qwest's January 15, 2002 version of the IMA CMP and confirms that version control is present. This issue is resolved.

2. The document lacks a change log to document the changes made since version 1b.

Qwest Response: Future IMA documents will indicate whether or not they have been baselined and approved.

KPMG Consulting reviewed Qwest's January 15, 2002 version of the IMA CMP and found versioning and baseline and approval status to be present. This issue is resolved.

3. The Table of Contents reflects incorrect page number references. For example, IMA Change Request Life Cycle starts on page 5, not on page 6, as indicated.

This issue is resolved.

4. The Table of Figures references figures that do not exist. For example, the document does not include the diagram, Consolidated Change Request Flow (Figure 1.1).

This issue is resolved.

5. Definitions of certain codes and abbreviations, e.g., PCB, BAP, SCM, PMO, FOM, and BPL, are missing.

KPMG Consulting reviewed Qwest's January 15, 2002 version of the IMA CMP and found that the document contains definitions of all referenced codes and abbreviations. This issue is resolved.

6. The document excludes essential change management process information, specifically:

(a) The document lacks entry and exit criteria for processes.

Qwest Response: No Qwest action required.

KPMG Consulting reviewed the "System Test CR Verification Procedure" document, along with the revised "IMA CMP" document. The Qwest distinction between a process document and a plan document is not apparent. The referenced process document, "System Test CR Verification Procedure", identifies entry and exit conditions. The plan document, "IMA CMP", provides similar procedural detail and instructions as the "System Test CR Verification Procedure". However, KPMG Consulting was unable to locate entry and exit criteria. This issue remains unresolved.

³² "The IMA CMP document is the main source of information and reflects current change management flow" Qwest 11/15/01 Response, Section 1.1, page 4 (of this KPMG Consulting 02-06-02 document).



ROC Observation & Exception Formal Response

- (b) The document does not describe what tools are used to effectively manage change requests and trouble tickets.

Qwest Response: Qwest will provide a response to this issue by February 7, 2002.

KPMG Consulting will review the updated DDTS and PCRM documents upon receipt. This issue remains unresolved.

- (c) The document lacks complete communications methods, and omits intervals for notifications, escalations, prioritization, restoration, and documentation updates. For example, no timeline for announcing CR prioritization or changes to a CR status is provided.

Qwest Response: Qwest understands that KPMG will review the above processes and procedures upon completion of the systems portion of the CMP Redesign. The systems portion of the CMP Redesign effort is anticipated to be completed by January 24, 2002.

KPMG Consulting expects that this discussion will continue during the February CMP Redesign Workshops. The systems portion of the CMP Redesign effort was not concluded on January 24, 2002. This issue remains unresolved.

- (d) The document lacks process flows. For example, no process flow for production support or CR prioritization is presented.

Qwest Response: Qwest understands that KPMG will review the Wholesale CMP Methods and Procedures document, to be completed by Qwest within one month after the completion of the systems portion of the CMP Redesign. The systems portion of the CMP Redesign is anticipated to be completed by January 24, 2002.

KPMG Consulting will review revised Qwest documentation for process flows after it becomes available. This issue remains unresolved.

- (e) The document does not address Testing Support and changes to test environments. For example, testing roles and responsibilities, as well as trouble escalation procedures for testing of new interfaces or new interface releases, are missing.

Qwest Response: Qwest understands that KPMG will review the above processes and procedures upon completion of the systems portion of the CMP Redesign. The systems portion of the CMP Redesign effort is anticipated to be completed by January 24, 2002.

KPMG Consulting will review revised Qwest documentation for Testing Support after it becomes available. This issue remains unresolved.

7. The document does not address the last three issues identified in the "Confidential Information" section of KPMG Consulting's initial observation report. Qwest neither responded to these issues, nor incorporated document revisions to address them.

Qwest Response: To date, Qwest has not received confidential Attachment A, referenced on pages 12 and 16, and therefore is unable to further respond to these three issues.

Inadvertently, the confidential attachment was submitted to Qwest on January 30, 2002 instead of with the first supplemental response to Exception 3102 on January 16, 2002. KPMG Consulting apologizes for any inconvenience this may have caused.

The status of the three issues is as follows:

- (f) IMA CMP documentation issue

Issue is resolved.

- (g) IMA CMP process and consistency of detail issue.

This issue remains unresolved. KPMG Consulting issued Data Request CM32.

- (h) IMA CMP process and CLEC notification issue.

This issue remains unresolved. KPMG Consulting issued Data Request CM33.



ROC Observation & Exception Formal Response

EDI Developer's Handbook Document Review

Qwest Response: Section 6 of the IMA CMP directs IMA staff to the process for making CLEC-impacting CRs visible to CLECs. Section 5 of the IMA CMP provides the linkage to the EDI Developer Handbook. KPMG Consulting requests that Qwest include CLEC touch-points in the EDI Developer's Handbook and submit the revised document for review. This issue is unresolved.

KPMG Consulting and Qwest held a focus call on Thursday, January 31, 2002. The purpose of the call was for Qwest to ask questions and for KPMG Consulting to clarify any major issues in Exception 3102. Qwest stated that a new "integration document" will address issues (a) through (h) listed in E3102 and provide the documented integration between the external Wholesale CMP and the Qwest internal change management processes. Participants of the call also clarified that depending on the progress of CMP Redesign, certain sections of the document may be incomplete.

KPMG Consulting will review the "integration document" when it becomes available for overall adequacy and completeness of the processes (a) through (h) identified in this Exception. .

KPMG Consulting recommends that Exception 3102 remain open pending resolution of the issues identified above.

Qwest Response to KPMG Supplemental Recommendation (02/14/2002):

KPMG addressed several issues in its Second Response to EXP 3102 on February 11, 2002.

In item 6(a), KPMG suggested that the IMA CMP document should include entry and exit criteria. Qwest will revise the IMA CMP to include entry and exit criteria and provide an updated version by February 22, 2002.

In item 6(b), KPMG stated that it would review the updated DDTS and PCRM documents upon receipt. In the February 7, 2002 supplemental response to EXP 3102, Qwest explained that the ClearDDTS Users Guide is Rational Software proprietary and can not be distributed by Qwest. Therefore Qwest is prohibited from providing an updated DDTS document. In February 7, 2002 supplemental response to EXP 3102, Qwest described DDTS. Qwest also clarified that DDTS is used internally to support IMA development and production support and is not meant to support Qwest's relationship with CLECs. In the February 7, 2002 supplemental response to EXP 3102, Qwest requested that KPMG refer to the February 11, 2002 response to Observation 3052 (TI 676) to address the PCRM portion of item 6(b).

KPMG requested that Qwest update the IMA EDI Developer's Handbook. Qwest will update the IMA EDI Developer's Handbook to include CLEC touch-points and provide an updated version by February 22, 2002.

The only other issues that remain open in this exception are Issue Nos. 6(c), 6(d), 6(e), 7(b) and 7(c). Qwest will address Issue Nos. 6(c), 6(d), and 6(e) following completion of the systems portion of the CMP Redesign. Qwest addressed Issue Nos. 7(b) and 7(c) through the data request process in data request Nos. CM32 and CM33.

Attachment(s):

Exhibit 5

EXCEPTION 3110

Qwest OSS Evaluation

Initial Release Date: January 24, 2002

EXCEPTION REPORT

An exception has been identified as a result of test activities associated with the Change Management Review, MTP Test 23.

Exception:

Qwest did not adhere to its Change Management Process document management standards and tracking of CLEC notifications through the Mailout Notification System.

Background:

Qwest utilizes the Mailout Notification System to distribute information that pertains to CLECs business operations. These notifications cover a wide range of topics including documentation updates, new product offerings, training availability, OSS planned outages, Qwest-CLEC meeting notices, Qwest's responses to CLEC-initiated change requests, and notices specifically concerning the Qwest Change Management Process (CMP). These distributions are critical to allow CLECs to make informed decisions about their business operations, as well as to maintain the Qwest-CLEC business relationship. CLEC representatives rely on accurate email headlines and timely notices to redistribute the emails within their respective organizations.¹

Issues:

Qwest did not adhere to its Change Management Process document management standards and tracking of CLEC notifications through the Mailout Notification System. KPMG Consulting reviewed a total of 115 CLEC notifications² that Qwest distributed through the Mailout Notification System in December 2001, and identified the following six issues:

¹ KPMG Consulting observed that, in response to CLECs' request during the CMP Redesign effort, Qwest implemented a standard naming convention for all Change Management email notifications beginning in August 2001.

² KPMG Consulting received a total of 119 Qwest mailout notifications in December 2001. Four of them were repeated distributions, and thus, were excluded from this analysis.

EXCEPTION 3110

Qwest OSS Evaluation

1. Delayed distribution

KPMG Consulting identified 32 instances (28% of the total notifications reviewed) in which Qwest's date of a notification was earlier than its actual distribution, thus representing a delay. While the majority of these delays fell within one business day, KPMG Consulting identified 13 instances in which the delay exceeded two business days. Appendix A includes one notification that was dated December 10, 2001, but was distributed on December 27, 2001.

Email Headline	Document Date	Distribution Date
System: CEMR User's Guide Update, RN, Effective 11/30/01	11/30/2001	12/3/2001
Systems: IMA GUI Documentation Update, non-release related, 12/03/01	11/30/2001	12/3/2001
General: Meetings: RN: Collo Decommission Mtg on 12-12, Effective 12-4-01, Final	12/4/2001	12/5/2001
System: OSS Scheduled Mtc., Final 12/4/01	12/4/2001	12/5/2001
Change Management: Meeting: RN: Update from 11-30 Mtg on UNE-P Bulk Conversion, Effective 12-4-01, Final	12/4/2001	12/5/2001
Minnesota Dept. of Commerce Interrogatory Docket P421/CI-01-1370	12/5/2001	12/6/2001
System: OSS Scheduled Maintenance, 12/10/01	12/10/2001	12/11/2001
System: OSS Sched. Mtee. Weekend of 12/14, 12/12/01	12/11/2001	12/12/2001
System: IMA GUI 8.1 CTAG Users Guide Update 12/13/01	12/10/2001	12/13/2001
Process: Ordering: RN: Updates to Local Service Ordering Guidelines,	12/14/2001	12/17/2001
Product: UNE: RN: Update to Unbundled Local Loop PCAT, Effective December 17, 2001, Final	12/14/2001	12/17/2001
Process: Provisioning: RN: Update to Customer Not Ready Jeopardy Process, Effective December 14, 2001, Final	12/14/2001	12/17/2001
System: CEMR User's Guide Update, 12/14/01	12/14/2001	12/17/2001
System: Delayed Bill Post Notifications, 12/14/01	12/14/2001	12/17/2001
System: Digital Certificates & ECOM Doc, 12/14/01	12/14/2001	12/17/2001
Local Service Freeze Protection: AZ, IA, MN, MT, NE, NM, WY	12/17/2001	12/18/2001
DMT Qwest DSL Change Charge	12/14/2001	12/18/2001
Qwest DSL Service Promotion	12/14/2001	12/18/2001
Customer Premises Wire and Maintenance Plans	12/14/2001	12/18/2001

EXCEPTION 3110

Qwest OSS Evaluation

Email Headline	Document Date	Distribution Date
Residence VMS Service, Effective 1/2/01	12/14/2001	12/18/2001
Training: IMA Release 9.0, RN, 12/18/01	12/14/2001	12/18/2001
Business Competitive Response – IA	12/17/2001	12/19/2001
Process: Ordering: RN: Update to Service Interval Guide, Effective December 20, 2001, Final	12/19/2001	12/20/2001
Switch Conversion-Woodland Park, CO 1-12-02	12/20/2001	12/21/2001
Local Directory Assistance – MN	12/14/2001	12/26/2001
Residence Caller ID and Security Screen Promo - IA, NM, OR, MT	12/21/2001	12/27/2001
Meet the Due Date Promotion, Effective 2/1/02	12/26/2001	12/27/2001
Residence Caller ID and Security Screen Promotion -ND, CO, WY	12/21/2001	12/27/2001
2002 Q1 Business Promotion Resale Notice - AZ, CO, IA, MT, NM, OR, SD, UT, WA, WY	12/26/2001	12/27/2001
Synchronous Service Transport, STS 1 Multiplexing	12/21/2001	12/27/2001
Business Caller ID Promotion, Effective 1/21/02	12/21/2001	12/27/2001
Residence Competitive Response Promotion - Utah	12/10/2001	12/27/2001

2. Erroneous topic

KPMG Consulting observed one instance in which the email headline contained an inaccurate description of its contents. On December 3, 2001, at 5:14 PM MT, Qwest distributed an email with the headline, "Process: Ordering: RN: Update to Resale Database Info, Effective December, 3, 2001, Final." The notification included with the email was titled "Updated Information for Getting Started as a Wholesale Customer & the Negotiations Process" (Document No. PROS.12.03.01.F.00325.Getting_Started_&_Negotiations).

3. Late notice of system changes

KPMG Consulting reviewed 10 notifications related to system changes, and identified four instances in which Qwest notified CLECs following implementation of the associated patch or change.

Email Headline	Implementation Date	Notification Date
System: Billing System Implementations, RN, Final, 12/3/01	11/15/2001	12/3/2001

EXCEPTION 3110

Qwest OSS Evaluation

Email Headline	Implementation Date	Notification Date
System: EMI Fields Fixed on DUF, RN, 12/6/01	11/29/2001	12/6/2001
System: Billing System Implementation 12-7-01, Final	11/29/2001	12/7/2001
System: Delayed Bill Post Notifications, 12/14/01	12/4/2001	12/14/2001

4. Inadequate interval for planned outage notices

KPMG Consulting identified eight notifications that were sent to CLECs about planned system outages. All were distributed within fewer than three business days in advance of the outage.³ In one instance, Qwest notified CLECs on December 7, 2001, at 5:41 PM, about a planned outage scheduled to start at 5:00AM on December 8, 2001. (Appendix B).

Email Headline	Planned Outage (Mountain Time)	Notification Date (Mountain Time)
System: OSS Scheduled Mtc., Final 12/4/01	12/7/2001 8:00 PM	12/5/2001 2:27 PM
System: OSS Scheduled Maintenance, N, Final, 12/5/01	12/9/2001 12:00 PM	12/5/2001 5:46 PM
Minnesota Dept. of Commerce Interrogatory Docket P421/CI-01-1370	12/9/2001 12:00 PM	12/6/2001 12:59 PM
System: DLIS Availability, 12/7/01	12/8/2001 5:00 AM	12/7/2001 5:41 PM
System: OSS Scheduled Maintenance, 12/10/01	12/12/2001 10:00 PM	12/11/2001 5:17 PM
System: OSS Scheduled Maintenance 12-13, 12/11/01	12/13/2001 10:00 PM	12/11/2001 5:30 PM
System: OSS Sched. Mtce. CEMR-MEDIACC 12/14-12/16	12/14/2001 10:00 PM	12/12/2001 6:16 PM
System: OSS Sched. Mtce. Weekend of 12/14, 12/12/01	12/13/2001 8:30 PM	12/12/2001 6:31 PM

5. Inadequate information

³ KPMG Consulting notes that Qwest has not formally defined the notification interval for planned system outages. See Action Item #209, p. 66 of the *CMP Redesign Draft Meeting Minutes Dec. 10-11*.

EXCEPTION 3110

Qwest OSS Evaluation

On December 27, 2001, Qwest distributed a notification informing CLECs of rate restructuring in Montana that was planned to take effect after the January 2002 billing date. Qwest advised CLECs to contact Qwest Billing Representatives for specific details after the changes were implemented, but did not specify an exact date for when the changes were to take effect (Appendix C).

6. Lack of adequate tracking and verification

In response to KPMG Consulting's data request and subsequent clarification, Qwest submitted copies of Mailout Notifications that it had distributed to CLECs, rather than an actual database or other logging tool used to track CLEC notifications⁴. KPMG Consulting infers from the data request responses that Qwest lacks a centralized database to track information that is distributed to CLECs.

Based on the above analysis, it appears that Qwest does not distribute accurate information on a timely basis. In addition, Qwest appears to lack the proper tools to track CLEC notifications and ensure that the information therein is accurate. KPMG Consulting considers the procedures, systems, and tools that Qwest uses to track information and monitor its compliance with documented intervals for notification to be an essential element of the Change Management process.

Impact

CLECs depend on accurate, dependable, and timely information to support their business and fulfill obligations of their customers. If a Mailout Notification includes an erroneous topic in its subject line, a CLEC may route the notification to the wrong department and responsible individual(s). If a Mailout Notification is distributed without an adequate interval in advance of the planned change, a CLEC might not have the flexibility to reschedule its workforce and to complete transactions in a timely manner. The issues identified in this Exception may result in CLEC operational inefficiencies, thereby reducing CLEC profitability and impacting the CLEC's ability to compete in the Local Exchange Carrier market.

Attachments: Appendices A, B, and C.

⁴ KPMG Consulting data request CM27: Database of Qwest notifications to CLECs. KPMG Consulting stated, in a subsequent clarification, dated December 12, 2001, that KPMG Consulting requested "the actual database tool or logging tool that Qwest uses to keep track of the notifications it has sent to CLECs."

EXCEPTION 3110
Qwest OSS Evaluation

Appendix A



December 27, 2001

KPMG Consulting
KPMG Data

,
qwestosscm@kpmg.com

To: KPMG Consulting

Announcement Date: December 10, 2001

Effective Date: December 10, 2001

Document Number: PROD.12.10.01.F.A000236

Notification Category: Product Notification

Target Audience: CLEC, Resellers

Subject: Residence Competitive Response Promotion - Utah

This is to advise you of a retail promotional offer. Qwest apologizes for the delay in notification.

Product name: Residence Competitive Response Promotion

EXCEPTION 3110

Qwest OSS Evaluation

Tariff/catalog/price list reference: No tariff

State(s): Utah

Effective date of retail offer: 12/10/01 through 3/9/02

Description:

The Residence Competitive Response Promotion will be offered during a promotional period from December 10, 2001 through March 9, 2002, to residence customers who have terminated or canceled all or part of their Company services and established service with another telecommunications provider, and such residence customers are reestablishing service with the Company.

Returning residence customers can receive a maximum of either a waiver of the current nonrecurring charge(s), or up to two months credit of the current monthly rate(s), or both, on selected services as determined by the Company.

Please notify only those resellers with approved resale agreements according to the terms specified in their resale agreement. Advise them that retail offers that are subject to Commission approval and may change. Reseller should monitor filings, since Qwest will not provide notification of changes.

If you have any questions or would like to discuss this notice please contact your Qwest Sales Executive, Sue Gwin on 3039653353. Qwest appreciates your business and we look forward to our continued relationship.

Sincerely,

Qwest

cc: Sue Gwin

Pam O'Connell

EXCEPTION 3110

Qwest OSS Evaluation

Appendix B



December 7, 2001

KPMG Consulting
KPMG Data

,
qwestosscm@kpmg.com

To: KPMG Consulting

Announcement Date: December 7, 2001

Effective Date: December 7, 2001

Document Number: SYST.12.07.01.F.02463.DLIS_Availability

Notification Category: General Notification

Target Audience: CLECs, Resellers

Subject: Directory Listing Inquiry System Availability

This *Communicator* is to advise you that, as a result of scheduled maintenance of the Listing Service System (LSS), the Directory Listing Inquiry System (DLIS) will not be available on December 8, 2001 from 5:00 AM to 8:00 PM Mountain time. The functionality is expected to be restored by 5:00 AM, Mountain time, December 10, 2001.

EXCEPTION 3110

Qwest OSS Evaluation

Questions regarding this *Communicator* can be directed to Melissa Garcia at 303-965-6019.

If you have any questions or would like to discuss this notice please contact your Qwest Service Manager, Pam O'Connell on 303-965-9303. Qwest appreciates your business and we look forward to our continued relationship.

Sincerely,

Qwest

cc: Sue Gwin

Pam O'Connell

EXCEPTION 3110

Qwest OSS Evaluation

Appendix C



December 27, 2001

KPMG Consulting
KPMG Data

,
qwestosscm@kpmg.com

To: KPMG Consulting

Announcement Date: December 27, 2001

Effective Date: December 28, 2001

Document Number: GENL.12.27.01.F.001516.Montana_Rate_Restructure

Notification Category: General Notification

Target Audience: CLEC, Reseller

Subject: Rate Restructuring for the State of Montana

In accordance with your Interconnection Agreement with Qwest Corporation (formerly doing business as U S WEST Communications, Inc), rates have been restructured pursuant to the Stipulation Agreement approved on October 12, 2001, by the Montana Public Service Commission in Docket Number D2000.6.89 by Order Number 6260b.

EXCEPTION 3110

Qwest OSS Evaluation

These rates will be reflected on or after your January bill date. Activity is in progress to apply billing adjustments based upon true-up requirements ordered by the Montana Public Service Commission as well as true-up requirements defined in your Interconnection Agreement.

Once the rates have been implemented and the adjustments have been applied, please contact your Qwest Billing Representative for specific details or if you have any questions.

If you would like a copy of your rate sheet, please contact your Service Manager.

If you have any questions or would like to discuss this notice please contact your Qwest Service Manager, Pam O'Connell on 303-965-9303. Qwest appreciates your business and we look forward to our continued relationship.

Sincerely,

Qwest

Note: While these updates reflect current practice, it is important to note that there are additional changes that will be forthcoming as a result of ongoing regulatory activities e.g., collaborative workshops, and state commission orders. As these changes are defined and implementation dates are determined, notice of additional updates will be provided accordingly.

The Qwest Wholesale Web Site provides a comprehensive catalog of detailed information on Qwest products and services including specific descriptions on doing business with Qwest. All information provided on the site describes current activities and process.

Prior to any modifications to existing activities or processes described on the web site, wholesale customers will receive written notification announcing the upcoming change.

cc: Sue Gwin

Pam O'Connell

Exhibit 6



ROC Observation & Exception Formal Response

Test Vendor ID:	EXP 3111
Qwest Internal Tracking ID:	TI 828
Observation/Exception Title:	Change Management Process
Test Type/Domain:	Test 23 - Change Management
Date Qwest Received:	01/30/2002
Initial Response Date:	02/12/2002

Test Incident Summary:

Exception 3111 was initially released as Observation 3067 on December 12, 2001. KPMG Consulting recommended on January 30, 2002 that Observation 3067 be closed and moved to Exception 3111.

EXCEPTION REPORT

An Exception has been identified as a result of the test activities associated with the Change Management Test, MTP Test 23.

Exception:

Qwest Systems Change Management Process (CMP) lacks guidelines for prioritizing and implementing CLEC-initiated systems Change Requests (CRs); criteria are not defined for developing the scope of an OSS Interface Release Package.

Background:

The Qwest Systems Change Management Process (CMP) is the method used by both Qwest and CLECs to implement changes to Qwest wholesale OSS interfaces. This process includes initiation, clarification/evaluation, presentation, prioritization, implementation, and completion of all systems change requests (CRs). CLECs participate in the CR Prioritization Process to vote on both Qwest- and CLEC-initiated CRs.¹ The outcome of this CR Prioritization Process determines if CRs deemed critical to CLEC business operations, according to CLEC voting results, will be included in an upcoming OSS release.

Issue:

Qwest Systems CMP lacks documented guidelines for prioritizing and implementing CLEC-initiated systems CRs. KPMG Consulting reviewed existing Qwest documentation, including the *Co-Provider Industry Change Management Process (CICMP) Document* and the *CICMP – CR Prioritization Process Document*², and noted the following:

- Qwest documents lacked information on the roles and responsibilities of Qwest staff involved in the analysis of CLEC-initiated systems CRs;

¹ In the context of CMP Redesign, Qwest and CLECs have not yet agreed on whether or not regulatory and industry guideline CRs are subject to the CR Prioritization Process.

² The *CICMP Document* and *CICMP – CR Prioritization Process Document*, located at www.qwest.com/wholesale/cmp/whatiscmp.html, represent the most recent Qwest documents relevant to the CR Prioritization Process prior to the initiation of CMP Redesign.



ROC Observation & Exception Formal Response

- Qwest documents lacked information on how Qwest allocated available resources (capacity) for all systems CRs to be included in an OSS release;
- Detailed business analyses and system analyses from the Qwest software development team were not performed for all CLEC-initiated CRs;
- Qwest documents lacked definitions and criteria for the Level of Effort (formerly known as "T-shirt size") assignment for individual CRs; and
- Qwest documents lacked information on how Qwest identified CR package options for a software release that it recommended to CLECs, following the CR Prioritization Process.

Impact:

In the absence of guidelines for the system CR Prioritization Process, there is no assurance that all CRs receive a thorough assessment from the Qwest software development team. In addition, it is unclear how Qwest allocates resources for the wholesale OSS to accommodate CLEC business needs, and how Qwest estimates the resources required to complete individual CLEC-initiated CRs. Failure on the part of Qwest to attend to CRs that CLECs deem critical to CLEC business operations in a timely manner may result in lengthy delays in implementing these changes. In fact, the limited capacity that Qwest allows for each release may categorically prevent the implementation of some CRs.

Qwest Formal Response to O3067 (12/20/01):

Qwest responses to the 5 KPMG stated issues.

1. *"Qwest documents lacked information on the roles and responsibilities of Qwest staff involved in the analysis of CLEC-initiated systems CRs."*

Once approved by the Re-design Team, the Master Redline CLEC-Qwest CMP Re-Design Framework Interim Draft - Revised 12-10-01, located at <http://www.qwest.com/wholesale/cmp/redesign.html>, will further illuminate the process, roles and responsibilities of Qwest personnel during the preliminary evaluation and subsequent prioritization of CLEC-initiated systems CRs.

2. *"Qwest documents lacked information on how Qwest allocated available resources (capacity) for all systems CRs to be included in an OSS release."*

Qwest and the CLECs are currently negotiating the extent to which Qwest will disclose this business information to the CLECs. This issue will be resolved and included in the Qwest Proposed Prioritization Language when it is accepted by the Re-design Team.

3. *"Detailed business analyses and system analyses from the Qwest software development team were not performed for all CLEC-initiated CRs."*

Detailed business and systems requirement development occurs after the CLECs and Qwest prioritize the list of CLEC initiated CRs pursuant to the Co-Provider Industry Change Management Process document, Section IV. Additionally, the Qwest Proposed Prioritization Language, collaboratively written by Qwest and the CLECs, but not yet adopted by the Re-design Team, details the following:

- There is insufficient space to include all CLEC initiated CRs in the upcoming release. The prioritization process channels the business and system requirements development effort.
- The business and system requirement development effort begins with CRs at the top of the prioritization list and continues down the list until all available development resources are exhausted.
- Business and systems requirements are developed for more CRs than can ultimately be included in the release.



4. *"Qwest documents lacked definitions and criteria for the Level of Effort (formerly known as "T-shirt size") assignment for individual CRs."*

The *Co-Provider Industry Change Management Process* document does not have specific definitions for Level of Effort. However, in the *Master Red-Lined CLEC-Qwest CMP Re-Design Framework Interim Draft - Revised 11-29-01* the following language has been agreed to in the *CLEC-Qwest OSS Interface Change Request Initiation Process* section:

"Identification of the preliminary level of effort (S, M, L, XL) required to implement the CR.

- Small – requires changes to only one subsystem of a single system
- Medium – requires changes to 2 or more subsystems of a single system
- Large – requires changes to 2 or more systems or complex changes in multiple subsystems of a single system
- Extra Large – requires extensive redesign of at least one system."

Additionally, Qwest and the CLECs are currently negotiating a refined preliminary Level of Effort criteria based on a rough estimate of the number of people-hours necessary to complete a CR.

5. *Qwest documents lacked information on how Qwest identified CR package options "for a software release that it recommended to CLECs, following the CR Prioritization Process."*

The CLEC-Qwest OSS Interface Change Request Initiation Process section of the *Master Red-Lined CLEC-Qwest CMP Re-Design Framework Interim Draft - Revised 12-10-01* provides the following language which has been agreed to by the CLECs and Qwest:

"At the monthly CMP meeting following the completion of the business and system requirements, Qwest will conduct a packaging discussion, which may include packaging options based on any affinities between candidates on the release candidate list. The newly packaged list of CRs will be used as the release candidate list during the design phase of a release. At the monthly CMP meeting following the completion of design, Qwest will commit to a final list of CRs for inclusion in the release."

KPMG Consulting's First Response to O3067 (01/04/2002):

KPMG Consulting reviewed Qwest's responses, and identified the following issues:

1. KPMG Consulting reviewed the *Master Redline CLEC-Qwest CMP Re-Design Framework* document but is unable to identify information therein that describes the roles and responsibilities of Qwest staff who conduct business and system analyses of CLEC-initiated systems CRs.
2. KPMG Consulting is aware of the ongoing CMP Redesign effort, and requests that Qwest provide related documentation for review, once it is finalized.
3. KPMG Consulting is aware of the possibility that not all CLEC-initiated, CLEC-prioritized CRs may be included in a given, upcoming release. It is thus critical that Qwest's software development team conducts a thorough assessment of all CRs, and provides CLECs with adequate information (see the following paragraph) so that CLECs are able to make informed decisions about *all CRs* during the prioritization process.
4. Based on the definitions of the preliminary levels of effort (S, M, L, and XL), KPMG Consulting could not quantify the amount of work performed by the Qwest software development team, or the total amount of work required for each software release. It is unclear how the above specifications



would inform CLECs of the overall capacity of a given, upcoming release, and enable CLECs to make informed decisions on the bases of interdependences, as well as tradeoffs, among numerous CRs, during the prioritization process.

5. KPMG Consulting reviewed the cited text and is unable to identify the criteria that Qwest software developers utilize to identify affinities between candidates.

Qwest Response to KPMG Comments to O3067 (01/14/02):

The following response addresses the five issues identified by KPMG in their response dated January 4th, 2002. KPMG's issues have been replicated below in *Italics* for ease of reading.

1. *KPMG Consulting reviewed the Master Redline CLEC-Qwest CMP Re-Design Framework document but is unable to identify information therein that describes the roles and responsibilities of Qwest staff who conduct business and system analysis of CLEC-initiated systems CRs.*

There has been no definitive discussion in CMP Redesign sessions to include a detailed description of the roles and responsibilities of Qwest staff who do not interface directly with CLECs on CMP functions, including those who conduct detailed business and system analyses of CLEC-initiated systems CRs. However, once approved by the Re-design Team, the Master Redline CLEC-Qwest CMP Re-Design Framework Interim Draft will further describe the process, roles and responsibilities of Qwest personnel who participate in the preliminary evaluation and subsequent prioritization of CLEC-initiated systems CRs.

As stated in Qwest's initial response, this text is not included in the *Master Redline* document because it has yet to be reviewed and approved by the CMP Redesign team. A draft of the text is contained in the document *Qwest Proposed Managing the CMP Language - Revised 11-20-01* which is located in the *Redesign Documentation* section of the Qwest CMP Redesign Web site.
(<http://www.qwest.com/wholesale/downloads/2001/011121/PrpManagingCMPLang.doc>).

2. *KPMG Consulting is aware of the ongoing CMP Redesign effort, and requests that Qwest provide related documentation for review, once it is finalized.*

Qwest will continue to publish completed and accepted Redesign documentation in the form of the most recent update of the Master Redline CLEC-Qwest CMP Re-Design Framework Interim Draft. This document is available on the Qwest CMP Redesign Web site, <http://www.qwest.com/wholesale/cmp/redesign.html>. Additionally, Qwest distributes an email message containing all Redesign documentation, agreed-to and proposed, before and after each Redesign session. KPMG representatives are included in these distributions. The next meeting of the CMP Redesign team is scheduled for January 22nd through 24th, 2002. The findings should be documented by January 28th, 2001. If that timetable is met, KPMG will receive the revised documentation no later than January 29th, 2002.

3. *KPMG Consulting is aware of the possibility that not all CLEC-initiated, CLEC-prioritized CRs may be included in a given, upcoming release. It is thus critical that Qwest's software development team conducts a thorough assessment of all CRs, and provides CLECs with adequate information (see the following paragraph) so that CLECs are able to make informed decisions about all CRs during the prioritization process.*

As discussed, agreed-to, and documented in Section 3.0 of the *Master Redline*, an initial "rough estimate" of the level of effort (LOE) for each CR is determined as an aid in CLEC prioritization. Due



ROC Observation & Exception Formal Response

to resource constraints, Qwest is unable to commit to conduct a detailed assessment of the level of effort (LOE) for every release candidate.

4. *Based on the definitions of the preliminary levels of effort (S, M, L, and XL), KPMG Consulting could not quantify the amount of work performed by the Qwest software development team, or the total amount of work required for each software release. It is unclear how the above specifications would inform CLECs of the overall capacity of a given, upcoming release, and enable CLECs to make informed decisions on the bases of interdependencies, as well as tradeoffs, among numerous CRs, during the prioritization process.*

After discussion during several recent Redesign meetings Qwest and the CLECs agreed to no longer utilize "T-shirt" sizing to categorize the level of effort for a release candidate. At Redesign meetings Qwest has agreed to provide CLEC's with actual level of effort range estimates in order for CLEC's to prioritize which CRs can be included in a major release. Qwest is currently developing these range estimates, and will present them to the CLECs at the January 2002 Redesign session. These estimated ranges are not intended to give the CLECs a view of the overall capacity of the release.

Qwest and the CLECs have agreed to a process documented in Section 3.0 of the *Master Redline* that will provide the CLECs with meaningful information with which to make informed decisions regarding the prioritization of CRs. That process is currently written as follows but will be updated to remove the T-shirt sizing when the ranges have been agreed upon.

"Qwest will review the CRs received prior to the cut off date and evaluate whether Qwest can implement them. Qwest's responses will be one of the following:

- "Accepted" (Qwest will implement the CLEC request) with position stated. If the CR is accepted, Qwest will provide the following in its response:
 - Determination and presentation of options of how the CR can be implemented
 - Identification of the preliminary level of effort (S, M, L, and XL) required to implement the CR. **(WCOM COMMENT: WCOM WOULD LIKE IT NOTED THAT A REQUEST WAS MADE AS TO WHAT IS MEANT BY PRELIMINARY LEVEL OF EFFORT AND IS TO BE DEFINED BY QWEST.)**
 - Small – requires changes to only one subsystem of a single system
 - Medium – requires changes to 2 or more subsystems of a single system
 - Large – requires changes to 2 or more systems or complex changes in multiple subsystems of a single system
 - Extra Large – requires extensive redesign of at least one system.

If CLECs do not accept Qwest's response, they may elect to escalate or dispute the CR in accordance with the agreed upon CMP escalation or dispute resolution procedures. If the originating CLEC does not agree with the determination to escalate or pursue the dispute resolution, it may withdraw its participation from the CR and any other CLEC may become responsible for pursuing the CR upon providing written notice to the Qwest CMP Manager. If the CLECs do not accept Qwest's response and do not intend to escalate or dispute at the present time, they may request Qwest to status the CR as deferred. The CR will be status deferred and CLECs may activate or close the CR at a later date.

At the monthly CMP meeting, the CR originator will provide an overview of its respective CR(s) and Qwest will present either a status or its response.

Qwest or CLEC originated CRs for changes to an existing OSS interface will then be prioritized by the CLECs and Qwest, resulting in the initial release candidate list. CLEC or Qwest originated CRs for introduction of a new interface or retirement of an existing interface are not subject to

prioritization and will follow the introduction or retirement processes outlined in Sections x and x of the *Master Redline*, respectively.

Based on the initial release candidate list, Qwest will begin its development cycle, which includes the following milestones:

- Business and systems requirements: Qwest engineers define the business and functional specifications during this phase. The specifications are completed on a per candidate basis in priority order.
- (AT&T Comment) *Packaging: Qwest and CLECs will discuss grouping candidates with affinities may be addressed more efficiently if taken together. [AT&T comment: this may not be exactly the right description. We just wanted to add this to this list of steps.]*
- Design: Qwest engineers define the architectural and code changes required to complete the work associated with each candidate. The design work is completed on a per candidate basis in priority order.
- Code & Test: Qwest engineers will perform the coding and testing required to complete the work associated with each candidate. The code and test work is completed on a per candidate basis in priority order.

Using the initial release candidate list, Qwest will begin business and system requirements. During the business and systems requirement efforts, CRs may be modified or new CRs may be generated (by CLECs or Qwest), with a request that the new or modified CRs be considered for addition to the release candidate list (late added CRs). **(WCOM COMMENTS: CHANGE "INITIAL RELEASE CANDIDATE LIST TO "RELEASE CANDIDATE LIST.)** If the CMP body grants the request to consider the late added CRs for addition to the release candidate list, Qwest will size the CR's requirements work effort. If the requirements work effort, for the late added CRs, can be completed by the end of system requirements, the initial release candidate list and the new CRs will be prioritized by CLECs in accordance with the agreed upon Prioritization Process (see Section xx of the *Master Redline*). If the requirements work effort, for the late added CRs, cannot be completed by the end of system requirements, the CR will not be eligible for the release and will be returned to the pool of CRs that are available for prioritization in the next OSS interface release.

At the monthly CMP meeting following the completion of the business and system requirements, Qwest will conduct a packaging discussion, which may include packaging options based on any affinities between candidates on the release candidate list. The newly packaged list of CRs will be used as the release candidate list during the design phase of a release. At the monthly CMP meeting following the completion of design, Qwest will commit to a final list of CRs for inclusion in the release."

This process, agreed-to by Qwest and the CLECs, provides a Level of Effort to the CLECs to use during Prioritization and outlines to process for Qwest to present various packaging options to the CLECs.

5. *KPMG Consulting reviewed the cited text and is unable to identify the criteria that Qwest software developers utilize to identify affinities between candidates.*

The assessment and identification of candidate affinities is not a structured process. Qwest relies on the knowledge and experience of its system architects and analysts to identify opportunities for efficiency in all areas of system development including those related to candidate affinity. A few of the factors considered in assessing affinities include modifications to common modules or data components, changes to common transactions, and use of common resources.



KPMG Consulting's Initial Release of Exception 3111 (01/30/2002):

KPMG Consulting responses for each issue raised in Observation 3067 are detailed below. For ease of reference, KPMG Consulting has assigned numbers for each issue.

- 1) *Qwest internal and external documents lack the roles and responsibilities of Qwest software development staff who are involved in the analysis of CLEC-initiated systems CRs;*

In its response to Observation 3067, Qwest affirmed that text regarding the roles and responsibilities of staff who conduct business and system analyses of CLEC-initiated systems CRs is not included in *Master Redline CLEC-Qwest CMP Redesign Framework Interim Draft*, since it has not yet been reviewed and approved by the CMP Redesign team. Qwest indicated that draft language was contained in another document, *Qwest Proposed Managing the CMP Language – Revised 11-20-01*. KPMG Consulting reviewed this document, and was unable to identify information therein that describes the responsibilities of Qwest staff who perform the preliminary evaluation, analyses, or subsequent packaging of CLEC-initiated CRs. Because the draft language has not yet been finalized or agreed upon as part of CMP Redesign, and is not included in any formal Qwest document, KPMG Consulting considers these roles and responsibilities to be undefined. As previously mentioned in its January 4, 2002 response to Observation 3067, KPMG Consulting continues to monitor the CMP Redesign process relative to the assignment of staff and managers.

KPMG Consulting deems the existence of defined roles and responsibilities for groups such as the IT staff, internal boards, external vendors, and Wholesale Change Management representatives to be indicative of whether or not a fully functional process is in place. KPMG Consulting recognizes that, prior to the CMP Redesign, Qwest operated a former process, referred to as the Co-Provider Industry Change Management Process (CICMP), and that, therein, established procedures for considering the CLEC-assigned priority of a change request in relation to such factors as available resources and Qwest-initiated priorities may have existed. KPMG Consulting would expect Qwest to be able to provide some information independent of CMP Redesign status that explains the functions of personnel who are responsible for evaluating CLEC-initiated CRs, as well as any guidelines used to carry out work assignments. This issue is unresolved.

- 2) *Qwest does not provide CLECs with information on the manner in which Qwest allocates available resources (capacity) for systems CRs to be included in an OSS release;*

Qwest's January 14, 2002 response stated that resolution of how Qwest allocates its available resources for systems CRs to be included in releases is still pending Qwest-CLEC negotiation of CMP Redesign. Under the terms of the CMP Redesign process, Qwest will continue to publish the completed and accepted Redesign documentation at the Qwest Redesign Web site. Qwest and CLECs held a series of meetings on January 22 through 24, 2002.

KPMG Consulting reviewed all information pertaining to resource allocation issues that was discussed at the most recent collaborative sessions. KPMG Consulting's understanding is that the documentation from those sessions remains incomplete and in draft state, and that Qwest plans to provide the *revised* documentation by January 29, 2002. KPMG Consulting is prepared to consider and review all *final* documentation that accurately describes the formalized, implemented process (i.e., documentation that reflects the most current representation of Change Management for this subtopic/area).

The lack of capacity resource information for conducting a fundamental task, i.e., implementation of changes requested by wholesale customers, is reflective of the larger issue, confirmed by Qwest, that no criteria defined for Qwest's developing the scope of an OSS Interface Release Package exist. Thus, when CLECs assign a priority for CRs, and collectively decide which they consider important, there is very little



ROC Observation & Exception Formal Response

information available about how Qwest factors the results of CLEC prioritization into its program development and project planning activities. This issue remains unresolved.

- 3) *Qwest software development teams do not perform detailed business and system analyses on CLEC-initiated CRs;*

In response to this issue, Qwest reiterated that it cannot include all CLEC-initiated CRs in a given, upcoming release, and that a detailed assessment of all CLEC-initiated CRs is infeasible due to resource constraints. Qwest also stated that it begins at the top of the prioritization list and continues down until all development resources are exhausted. Systems requirements are developed for more CRs than can ultimately be included in the release. Yet, it is unclear as to if, or how, Qwest considers relative costs and benefits, whether or not there is any pairing or interaction between system CRs filed for the same release (i.e., affinities), and if any of the same CMP development resources are dedicated to correct defects and conduct maintenance of Qwest production systems. In a discussion about meeting topics, one CLEC noted that, during the January 2002 prioritization exercise, some lower priority items were "packaged" (i.e., scheduled for inclusion in a release), whereas some higher priority requests were excluded or delayed.³

KPMG Consulting considers the fact that Qwest software development teams do not perform structured business and systems analysis of CLEC-initiated CRs as another indicator that no defined criteria are used to determine the overall scope of release capacity, and no systematic, consistent, and repeatable process is used to implement both CLEC and Qwest-initiated change requests. This issue, which remains unresolved, is related to the level of effort (LOE) estimate, which Qwest stated was already agreed-to as an aid to CLEC prioritization.

- 4) *Qwest documents lack definitions and criteria for establishing the Level of Effort (LOE, formerly known as "T-shirt size") assignment for individual CRs; and*

In response to this issue, Qwest indicated that it plans to revise the LOE parameters to provide CLECs with an actual level of effort range. It also stated that these ranges would not be intended to provide CLECs with a view of the overall capacity of the release. Qwest outlined the agreed-upon packaging process that is included in the *Master Redline* document. Although the Redesign efforts have resulted in progress for this area, and some language has been completed, incorporation of LOE ranges remains unresolved until CLECs and Qwest can agree upon the appropriate level of detail for CR sizing definitions. Participants in the CMP Redesign meetings held January 22 through 24, 2002, did not discuss or resolve pending Action Items, including #146 *Criteria used to determine LOE for a release*. In its previous response, Qwest stated that it is unable to commit to conducting a detailed assessment of the LOE for every release candidate. KPMG Consulting requests that Qwest provide information about which release candidates will receive detailed business and system analyses, and how this decision will be made. This issue is unresolved.

- 5) *Qwest documents lack information on the manner in which Qwest identifies CR package options for a discrete software release that it recommends to CLECs, following the CR Prioritization Process.*

In response to this issue, Qwest stated that, "the assessment and identification of candidate affinities is *not a structured process*" [italics added]. This served as a further indication that criteria, such as those that Qwest would use to identify package options, do not exist, are not formally defined, and are not documented, either internally or within the context of CMP Redesign. This issue is unresolved.

³ See CMP Redesign email sent by Qwest to Eschelon Telecom, Inc. on January 22, 2002, Subject: *Redesign issues discussed in January CMP meetings*, Item Number 4.



Observation 3067 has been escalated to Exception 3111 for three reasons:

- KPMG Consulting considers the five sub-issues above unresolved; some issues appear to be at impasse.
- Qwest stated that elements described in the original Observation will not be finalized (and thus cannot be implemented) until CMP Redesign is complete.
- Based on Qwest's latest response and the current state of CMP Redesign implementation, at least one KPMG Consulting evaluation criterion for Test 23 would be assigned a "Not Satisfied" result.

To summarize, criteria for use by Qwest's software development teams to develop the priorities, capacity, and capabilities of a software release are neither documented nor fully defined. The lack of established and documented development criteria, and a clear process for Qwest resource allocation for wholesale OSS, may result in the Qwest software development teams' overlooking and/or ignoring CRs deemed important to CLECs, as determined by the results of the prioritization process. Failure on the part of Qwest to attend to CRs that CLECs deem critical to their business operations in a timely manner may result in lengthy delays in implementing these changes. This may prevent CLECs from receiving important order and pre-order functionality, thus inhibiting their ability to compete in the local exchange carrier market.

Qwest Formal Response to Exception 3111 (02/12/2002):

Listed below are Qwest's responses to each of the "sub-issues" identified in KPMG's previous response. The numbers correspond to those used by KPMG.

1. Qwest will provide, via the data request process, documentation of the internal methods and procedures that define the roles and responsibilities for Qwest personnel involved in prioritization of CLEC initiated system change requests. The documentation will be made available by February 22nd, 2002.
2. The Master Redline document, Section 9.2 states: *"At the last Systems CMP meeting before Prioritization, Qwest will facilitate the presentation of all CRs eligible for Prioritization. At this meeting Qwest will provide a high level estimate of the Level of Effort of each CR and the estimated total capacity of the release. This estimate will be a rough estimate of the number of person hours required to incorporate the CR into the release."*

Qwest has subsequently added similar language in the CR Initiation section to state that LOEs will be provided: 1) Prior to prioritization 2) At packaging and 3) At commitment. The submitted text will be reviewed with the CLECs during the next CMP Redesign session scheduled for February 19th, 2002. Qwest will provide an update regarding the progress of this issue in a supplemental response to this exception by February 22, 2002. IMA 11.0 and SATE 11.0 will be the first releases for which Qwest will provide release capacity estimates for use in the CR prioritization process.

3. As stated above in the response to sub-issue 2, Qwest agreed to provide the capacity constraints of major releases for use in prioritization of CRs. Qwest also provides a high level estimate of the LOE for all CR candidates for use CR prioritization. After prioritization, Qwest conducts a detailed evaluation of each CR candidate beginning with the highest priority CR and ending when the capacity of the release is exhausted. All of these activities are identical whether Qwest or a member of the CLEC community initiated the CR.

The CMP redesign sessions conducted February 5-7 2002 concluded without a resolution to CR prioritization. The topic will be re-addressed at the next CMP Redesign session scheduled for February 19th, 2002. Qwest will provide an update regarding the progress of this issue in a



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supplemental response to this exception by February 22, 2002. When the prioritization process is agreed upon this sub-issue will be completely addressed.

4. As stated in the prior response and reiterated in the response to sub-issue 3 above, Qwest provides a high level estimate of the LOE required for each CR candidate. The high level estimate is for use in candidate prioritization. After the release candidates are prioritized, using the process agreed to in the CMP redesign, Qwest conducts a detailed assessment of the LOE for each candidate beginning with the highest priority candidate and concluding when the estimated capacity for the release is exhausted.

Qwest and the CLECs have achieved significant progress toward defining the LOE estimation process for change requests. These refinements are reflected in the most recent version of the Master Redlined Document posted on Qwest's web site repository for CMP documents.

5. Qwest will provide, via the data request process, documentation of the internal methods and procedures followed by Qwest to identify packaging efficiencies for system changes. The documentation will be made available by February 22nd, 2002.

Attachment(s): None

Exhibit 7



ROC Observation & Exception Formal Response

<i>Test Vendor ID:</i>	EXP 2003
<i>Qwest Internal Tracking ID:</i>	TI 281
<i>Observation/Exception Title:</i>	Release Schedule Incomplete
<i>Test Type/Domain:</i>	Relationship Management
<i>Date Qwest Received:</i>	03/29/2001
<i>Initial Response Date:</i>	04/12/2001
<i>Supplemental Response Date:</i>	06/28/2001
<i>2nd Supplemental Response Date:</i>	12/21/2001
<i>3rd Supplemental Response Date:</i>	02/12/2002

Test Incident Summary:

An exception has been identified as a result of the test activities of the pseudo-CLEC.

Exception:

Qwest does not follow its established release notification schedule when implementing IMA releases, and does not provide complete and accurate information in its release notifications to enable co-providers to prepare adequately for certification and implementation of new releases.

Background:

When implementing a new IMA EDI release, Qwest makes available a series of documents to co-providers to assist them in their certification and implementation efforts. Qwest's Co-provider Industry Change Management Process (CICMP) organization handles the process of tracking releases and notifying co-providers of release information and schedules. Qwest develops the scheduling of IMA releases internally, and posts the targeted timeline of release dates in a calendar on the CICMP web page.

During the P-CLEC's EDI implementation kick-off meeting, Qwest did not provide details relative to the process by which it plans and schedules EDI releases. However, the P-CLEC presumes that the CICMP calendar is based upon the IMA Matrix in Qwest's Release Notification Enhancement document found on the CICMP web page.¹

Based upon the P-CLEC's experience in implementing EDI Release 6.0, Qwest has not followed its established release timeline. Because of Qwest's deviation from the posted release schedule, the P-CLEC experienced implementation planning, resource scheduling, and quality assurance issues. The attached spreadsheet provides a comparison between Qwest's expected release timeline, as defined in the IMA Matrix,² the CICMP calendar's posted release notification delivery dates, and the actual dates that the P-CLEC received Qwest release notifications. As the attachment shows, on many occasions, Qwest delivered release notifications late. Specifically, Qwest published the Release 6.0 Recertification Notice on the same day it released IMA 6.0, three weeks after its projected delivery date. Qwest's Release Notes

¹ http://www.qwest.com/wholesale/downloads/enhancement_120600.ppt.

² The projected release timeline was determined by counting backward the number of days or weeks stated in the IMA Matrix from Qwest's stated target release dates of December 11, 2000 for Release 6.0 and February 26, 2001 for Release 6.01.



ROC Observation & Exception Formal Response

Descriptions, which should have been delivered six weeks prior to the target release date, on October 11, 2000, were not received by the P-CLEC until October 27, 2000.

Further, when Qwest provides release notifications to the co-provider community, it does not always provide complete and accurate information. For example, though Qwest published the Release 6.0 Baseline Candidates only one day after the date listed on the CICMP calendar – and approximately three weeks earlier than the projected delivery date based on the IMA Matrix timeline – Qwest had to release a clarification to the Baseline Candidates on August 23, 2000 – more than one month after the CICMP calendar delivery date, and nearly two weeks after the IMA Matrix-defined projected delivery date. Qwest also released two addenda to its EDI Release 6.0 Disclosure Documents. These addenda were published after the release of IMA 6.0 to correct errors in the original Disclosure Documents. The P-CLEC found the implementation of the two addenda to be cumbersome due to its impact on the integrity of the EDI mapping applications and the piece-meal nature of arriving at a complete set of business rules specifications. Additionally, the P-CLEC found the analysis of the change summaries to be confusing due to a lack of clarity as to how to incorporate the content in the second disclosure document addendum. Specifically, it was not evident whether the second addendum was inclusive of the changes noted in the first addendum. Qwest does not provide a documented process that details how a co-provider should implement changes noted in the disclosure document addenda.

Issue:

Because Qwest has not adhered to its stated implementation timeline, co-providers have not been afforded adequate time to prepare for implementation of new releases. Co-providers must complete their analysis, development, and testing efforts within a shortened time frame, which creates greater opportunity for errors to occur in a co-provider's implementation efforts.

Further, the incomplete nature of Qwest's release notifications further complicate co-providers' certification efforts by forcing co-providers to work with continually changing documentation. Qwest's inability to provide complete and accurate release documentation in its initial delivery of release notifications greatly increases the time and resources a co-provider must commit to implementing a new IMA EDI release.

Impact:

If Qwest does not meet its established timelines for the publishing of IMA EDI release documentation, co-providers will not be able to make a smooth transition from their current EDI release to a new release. Further, multiple and frequent changes to release documentation causes co-providers to expend additional time and resources on release documentation that is not necessarily complete or accurate. These frequent and voluminous changes to release specifications will lead to the failure of co-providers' implementation efforts, and will, ultimately, delay co-providers from entering into production in a new release and executing their business plans.

Qwest Response Summary:

Qwest has fully researched the issues outlined in this Exception and does not believe it constitutes a problem.

During the project initiation discussion Qwest and the CLEC determine objectives and scope of the implementation, the time frames, and the EDI interface release against which implementation will be performed. Qwest provides a timeline of when Release Notifications were and will be published and made available to the CLEC. Qwest believes that this process currently adequately addresses the implementation planning and scheduling activities.

All pertinent information is published by Qwest through the CICMP process and in interactions with the CLEC, which includes a calendar on the CICMP web page, Release Notifications, and other documents. While it is Qwest's utmost desire to meet or exceed all published target dates, it is noted that all proposed



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IMA release dates are only targets and changes may occur during an IMA release life cycle that impacts these target dates. Should changes occur, Qwest will update its target dates and communicate this to the co-provider.

With respect to the timing around re-certification, it should be noted that during the conversion to a new IMA EDI Release, it is the CLEC that initiates the beginning of the migration process. An initial migration meeting will be held to discuss re-certification, migration strategy and data conversion. A project plan will be developed and mutually agreed upon to assist in the scheduling of appropriate resources for the migration.

HP Comments 05/14/01:

As documented in the Exception, Qwest does not follow its established release notification schedule when implementing IMA releases, and does not provide complete and accurate information in its release notifications to enable co-providers to prepare adequately for certification and implementation of new releases. Co-providers must complete their analysis, development, and testing efforts within a shortened time frame, which creates greater opportunity for errors to occur in a co-provider's implementation efforts. Further, Qwest's inability to provide complete and accurate release documentation in its initial delivery of release notifications greatly increases the time and resources a co-provider must commit to implementing a new IMA EDI release.

Discussion

Based upon the P-CLEC's experience in implementing EDI Release 6.0, Qwest did not follow its established release timeline, as posted on the CICMP website calendar. Because of Qwest's deviation from the posted release schedule, the P-CLEC experienced implementation planning, resource scheduling, and quality assurance issues. In the Exception, the P-CLEC provided a table comparing the targeted release dates of IMA 6.0 Release Notifications, and the actual dates on which the release notifications were distributed by Qwest. Among the late release notifications, Qwest provided the 6.0 Recertification Notice on the same day Release 6.0 was implemented and three weeks after the projected delivery date. Further, this Exception noted that Qwest release notifications do not always provide complete and accurate information. As examples, the Exception cited Qwest's release of a clarification to the Release 6.0 Baseline Candidates on August 23, 2000 – more than one month after the CICMP calendar delivery date (July 20, 2000) and the release of the initial Baseline Candidates notification (July 21, 2000). The Exception also reported that Qwest had to release two addenda to its EDI Release 6.0 Disclosure Documents, published after the release of IMA 6.0 to correct errors in the original Disclosure Documents. The P-CLEC found the implementation of the two addenda to be cumbersome due to its impact on the integrity of the EDI mapping applications and the piece-meal nature of arriving at a complete set of business rules specifications. Additionally, the analysis of the change summaries was confusing because it was not evident whether the second addendum was inclusive or exclusive of the changes noted in the first addendum. This confusion is compounded by the fact that Qwest does not provide a documented process that details how a co-provider should implement changes noted in Disclosure Document addenda. In Qwest's response to the cited issues, it indicated that it does not believe this Exception documents a problem with its systems or processes. Qwest indicated that, during the EDI implementation process with a co-provider, Qwest provides a timeline of when Release Notifications were and will be published and made available to the co-provider, and stated it believes this process adequately addresses the necessary implementation planning and scheduling activities. Qwest noted that, while it is desirable to meet or exceed all published target release dates, there is a notice on the CICMP Release Calendar that all proposed IMA release dates are only targets and changes may occur during an IMA release life cycle that impact these target dates. Should changes occur, Qwest stated it would update its target dates and communicate this to the co-provider.

With respect to the Exception's use of the delayed IMA 6.0 Re-certification Notice, Qwest indicated that, during the conversion to a new IMA EDI Release, it is the co-provider's responsibility to initiate the migration process. An initial migration meeting will be held to discuss re-certification, migration strategy



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and data conversion. A project plan will be developed and mutually agreed upon to assist in the scheduling of appropriate resources for the migration.

Recommendation

HP does not believe that Qwest has fully addressed the issues raised in this Exception. First, while Qwest notes that its published target release dates may change during the life cycle of an IMA release, Qwest has not addressed the impact that such delays have on a co-provider's ability to accommodate and plan for new release implementations on a shortened timeframe. Co-providers plan their release implementations based on the release calendar provided by Qwest. If a co-provider cannot be assured that targeted release dates will be met, it will have difficulty coordinating the necessary resources to implement the new release. Further, when a documentation release is delayed, co-providers must alter their development and implementation plans to ensure that the appropriate resources are available to complete the necessary review and development in the shortened timeframe.

Second, Qwest indicated in its response that the co-provider is responsible for initiating the migration process to a new release, and that, consequently, its publishing of the IMA 6.0 Re-certification Notice three weeks behind schedule, and on the same date IMA Release 6.0 was implemented, does not constitute a problem. While HP accepts that the co-provider may be responsible for initiating migration to a new IMA release, this does not remove from Qwest the responsibility to notify co-providers in a timely manner that re-certification and migration plans need to be developed. The Re-certification Notice is important to co-providers in their planning for the migration process in that it provides the timeframes in which re-certification must be completed.

Third, in addition to Qwest's delayed publishing of Release Notifications, this Exception also addressed the issue of Qwest's frequent re-release of Release Notices and Disclosure Documentation. As was documented in the Exception, when Qwest releases addenda to its documentation, co-providers are forced to develop their interfaces in a piece-meal fashion and often have to re-code their EDI maps to account for changes to Qwest's business rules specifications. This requires co-providers to devote additional time and resources to the development and implementation of new IMA releases. In its response, Qwest did not address this deficiency in its release change management process.

HP recommends that this Exception remain open pending the outcome of the current ROC TAG review of proposed Change Management Performance Indicator Definitions (PIDs). Of the Change Management PIDs under consideration, this Exception directly correlates to "PO-16 Timely Release Notifications," proposed by Qwest and "RQ-3 Release Quality," proposed by the co-provider community. Implementation of these PIDs will require Qwest to resolve the root cause of the issues cited in this Exception in order to meet established benchmark performance standards.

Further, HP requests clarification with regard to the multiple releases of Disclosure Document addenda and release notifications cited in this Exception, as these multiple releases have a significant effect on the quality and reliability of an IMA EDI Release, and impact a co-provider's ability to plan, develop, test and implement its EDI interface. The attached table, identifying the multiple revisions and addenda to the IMA Release 6.0 Disclosure Documents, shows the magnitude of this impact on co-providers.

Qwest Supplemental Response to HP Comments (06/28/2001):

Qwest is making a proposal to change its change management program to meet the needs of the industry and align Qwest with evolving industry directions. To this end, Qwest is working this issue in the regulatory workshops and the CICMP Forum and has prepared a proposal for collaborative development of a change management program that will address the concerns raised in this and other observations. The details of the program will be collaboratively refined with the CLECs in the Qwest CICMP forum. Qwest has identified and expects the program to contain the following elements, some of which address the issues raised in this observation. For example:



ROC Observation & Exception Formal Response

- On a quarterly basis, Qwest would begin sharing with Co-Providers its 12-Month Development View (View) that includes all proposals that impact Co-Providers—those initiated by Qwest and Co-Providers. Co-Providers would then have an opportunity to provide Qwest with input to the development plan.
- Qwest proposes to improve its application-to-application notification process to meet the requirements proposed by the industry's Ordering and Billing Forum (OBF) with Issue 2233. Qwest proposes to incorporate into the CICMP Qwest initiated CRs which impact Co-Providers, classify and prioritize CRs by severity type and collaborate with CLECs to develop system releases that include and meet regulatory, system and CLEC requirements.
- In addition, Qwest's proposal will include guidelines and procedures for:
 - Escalations/Expedites of changes
 - New and/or Retired Interfaces
 - Change notification for Products/Processes

Qwest believes that this comprehensive and collaborative approach to change management will address these issues and align Qwest with the direction the industry is taking with change management. Additional information/details will be available once the work in regulatory workshops and with the CLECs has concluded.

Qwest is in ongoing negotiations with the ROC TAG to arrive at agreement on two Change Management Performance Indicator Definitions (PIDs). The Change Management PIDs under consideration include "PO-16 Timely Release Notifications," and "GA-7 Software Outage Resolution". A meeting was held June 20th to review the latest drafts of these proposed PIDs. In that meeting tentative agreement was reached on PO-16. Formal TAG approval is expected in the June 28th TAG meeting. Qwest needs to provide a response to two outstanding issues on GA-7 and expects approval upon satisfactory resolution of these two issues. Implementation of these PIDs will require Qwest to resolve the root cause of the issues cited in this Exception in order to meet established benchmark performance standards. Qwest does not support the third Change Management PID, "RQ-3 Release Quality," proposed by the co-provider community. This PID proposal is at impasse and under review by the ROC Steering Committee.

HP Supplemental Recommendation (12/21/2001):

HP agrees with Qwest's proposal in their Supplemental Response dated 6/28/2001:

"Qwest is making a proposal to change its change management program to meet the needs of the industry and align Qwest with evolving industry directions."

Due to the nature of the complexity of the solution to this Exception and the length of time it will take for Qwest to implement, HP recommends that this Exception remain open pending the successful implementation of the changed CICMP process.

Based on Qwest's Agenda provided for the July 11th, 2001 "CLEC/Qwest working session to modify the Change Management Process", there will be a timeline adapted for proposal review with the CLEC community.

And further based on the outcome of the timeline development, HP will provide an update to this Exception recommendation on a quarterly basis.

Qwest Focus O&E Supplemental Response (12/21/2001):

Qwest held a call on December 13 with HP to clarify remaining questions in order to close this observation. Qwest will proceed to answer the remaining questions listed below from this call.



1. Has Qwest addressed the impact that changes to published target release dates during the life cycle of an IMA release have on a co-provider's ability to accommodate and plan for a new release implementations on a shortened timeframe?

Qwest Response: Qwest has addressed the impact that changes to published target release dates have on a CLEC's ability to accommodate and plan for a new release. In the CMP Redesign effort, Qwest and CLECs have collaboratively developed language governing IMA-EDI releases. This language is included in the *Changes to Existing OSS Interfaces* section of the *Master Redlined CLEC-Qwest CMP Re-design Framework - Revised 12-10-01* (<http://www.qwest.com/wholesale/cmp/redesign.html>). This section details how Qwest will follow a 73-calendar day timeframe, beginning with the publication of draft technical specifications, similar to the timeline outlined in the proposed Ordering and Billing Forum (OBF) guidelines. Qwest will begin implementation of this timeline and language beginning with IMA-EDI release 10.0.

2. Has Qwest addressed requirements for Re-certification Notice to co-providers that re-certification and migration plans need to be developed? Timeframe requirements? Content requirements?

Qwest Response: The CMP Redesign team, along with Qwest, is negotiating refined language to the existing certification and re-certification processes, including discussion of migration test planning, content, and timeframes. Qwest has provided the Redesign Team with proposed language addressing these subjects. The Redesign Team will address these issues at the January 22, 23, and 24 Redesign session.

3. Has Qwest addressed issues with regard to the multiple releases of Disclosure Document addenda and release notification releases?

Qwest Response: Qwest will propose language on January 18, 2002, that will address the CLEC's concerns regarding multiple changes to Disclosure Documentation in a post production environment that require changes to CLEC's systems. Addendum language will be discussed and potentially agreed upon during the January 22, 23, and 24 Redesign session.

4. Has Qwest addressed deficiencies in its release change management process related to Qwest's release of addenda to its documentation?

Qwest Response: See Qwest's response to #3 above.

HP 2nd Supplemental Recommendation (January 11, 2002):

Qwest's responses to Questions #2 and #3 indicate that the CMP Re-Design Core Team will be reviewing proposals related to the resolution of the Exception during the January 22-24 redesign meetings. Also, Qwest indicates in its response to Question #3 that it has not yet completed the proposed draft language or provided it to the redesign team. This proposed language, according to Qwest, will be available on January 18, 2002.

In order to ensure that the language proposed by Qwest, and reviewed by the CMP Re-Design team, addresses the open issues of this Exception, HP requests the following:

1. *Qwest provide HP with copies of the proposed language, referenced in its responses to Question #2 and #3 above, that have been, or will be, provided to the CMP Re-Design Core Team for discussion in the January 22-24 redesign meetings; and*



ROC Observation & Exception Formal Response

2. Qwest provide HP with a summary of the discussions, and any decisions made, during the January 22-24 redesign meetings on the points that apply to the answers provided in this response.

HP will continue to monitor this Exception by means of a re-test (Category 4) and will provide a supplemental response after the above requests have been satisfied and completed.

Qwest Response to HP Second Supplemental Recommendation (February 12, 2002):

Qwest has reviewed HP's request and is providing the following information and documentation in response to items 1 and 2 above.

1) Qwest [to] provide HP with copies of the proposed language, referenced in its responses to Question #2 and #3 above, that have been, or will be, provided to the CMP Re-Design Core Team for discussion in the January 22-24 redesign meetings;

Qwest has attached the two documents that outline the proposed language for Disclosure addenda (Attachment 1) and Certification/Re-certification (Attachment 2). Certification/Re-certification language was discussed and inserted into the "Master Redlined CLEC-Qwest CMP Redesign Framework - Revised 02-07-02" at the February 5-7 CMP Redesign session. Section 10.1 of the agreed Certification/Re-certification language, which is included in Attachment 2, addresses test planning, content, and timeframes. Qwest's disclosure addendum proposal has not been discussed to date.

2) Qwest provide HP with a summary of the discussions, and any decisions made, during the January 22-24 redesign meetings on the points that apply to the answers provided in this response.

Qwest proposed that both of the items described above be covered in the January 22-24 Redesign session. See the agenda mailed to attendees with the appropriate highlights (Attachment 3). Unfortunately, many issues were not addressed due to extended discussions on some issues. Certification/Re-certification language was discussed and inserted into the "Master Redlined CLEC-Qwest CMP Redesign Framework - Revised 02-07-02" at the February 5-7 CMP Redesign session. Qwest disclosure addendum proposal has not been discussed to date.

Attachment(s): ROC_TI281_EXP2003_Attachment_1_02_12_02.doc,
ROC_TI281_EXP2003_Attachment_2_02_12_02.doc,
ROC_TI281_EXP2003_Attachment_3_02_12_02.doc

Exhibit 8

EXCEPTION 3094 – SECOND RESPONSE

Qwest OSS Evaluation

Initial Release Date: December 12, 2001
First Response Date: January 7, 2002
Second Response Date: February 12, 2002

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Change Management Test, MTP Test 23.

Exception:

Qwest did not adhere to its established change management process for notifying CLECs about a proposed change, and allowing input from all interested parties.

Background:

The Qwest Product/Process Change Management Process (CMP) is the method used by both Qwest and CLECs to introduce and implement changes to Qwest wholesale products and business processes. The Qwest CMP managers are responsible for the administration of Change Requests (CRs) and Notifications, including changes to, and updates of, relevant Qwest documentation. The Qwest Subject Matter Experts (SMEs) are responsible for the products and processes associated with proposed changes.

KPMG Consulting observed an instance in which Qwest did not provide CLECs with complete information about, and a reasonable interval for, a CLEC-impacting CR. On October 17, 2001 Qwest informed CLECs of a Qwest-initiated Process CR PC100101-5 "Clarification of additional testing process" (see Attachment A), which was scheduled for implementation on November 19, 2001¹. At a follow-up meeting on October 31, 2001, CLECs reported to Qwest that the CR would affect their business operations, and that Qwest did not provide adequate information about this CR to answer the following questions:

- Regulatory: CLECs requested that Qwest investigate whether or not the proposed CR would comply with Qwest's legal obligations, such as SGATs and Interconnection Agreements;
- Products: CLECs requested that Qwest provide a list of all products affected by this CR. At the follow-up meeting, Qwest was unsure if the CR would affect line-shared loops; and
- Documentation: CLECs requested that Qwest include the precise wording of the affected Product Catalogue (PCAT) in the CR. In the CR, Qwest provided limited text to describe the new process, and how the changes would affect CLECs.

¹ Information about this CR and supporting documentation (process documentation, process presentation, and Question & Answers) may be found at <http://www.qwest.com/wholesale/cmp/changerequest.html>.

EXCEPTION 3094 – SECOND RESPONSE

Qwest OSS Evaluation

In order to respond to the remaining CLEC inquiries, Qwest scheduled a follow-up meeting on November 26, 2001, and delayed the scheduled implementation until December 1, 2001.

During CMP Redesign meetings, at least three CLECs made an attempt to halt the implementation date and escalate this CR. Qwest implemented CR PC100101-5 on December 1, 2001, and distributed a notification on December 3, 2001².

The event timeline for the CR that is the subject of this Exception is as follows:

Date	Event
10/17/2001	Qwest presented change request (CR) PC100101-5 "Clarification of additional testing process" at the monthly Change Management meeting.
10/31/2001	Follow-up meeting held – Intended for Qwest to clarify outstanding issues.
11/26/2001	Follow-up meeting held – Qwest answered some of the questions from CLECs.
12/01/2001	Scheduled process implementation date
12/04/2001	Qwest notification about update applied to CEMR User Guide. CLECs issue written statement requesting a status update, and that Qwest immediately stop implementation of this CR.

Issue:

KPMG Consulting observed the following issues related to CR PC100101-5:

- Qwest, through the CMP, did not provide adequate information to CLECs about a significant CLEC-impacting process change;
- Once Qwest had answered some of the important regulatory, product, and documentation questions, Qwest allowed only four (4) business days for CLECs to prepare for the proposed change³;
- Qwest, through the CMP, did not respond to input from all interested parties; a number of CLECs objected to Qwest's implementation of this change and requested its immediate suspension.

² Qwest notification titled "Documentation: CEMR: User's Guide Updated: 12/03/01."

³ At the time of this report, KPMG Consulting observed that Qwest and CLECs had not agreed on all legal and regulatory aspects of this CR.

EXCEPTION 3094 – SECOND RESPONSE

Qwest OSS Evaluation

- Qwest, through the CMP, did not update CR status on a timely basis;
- Qwest CR includes rate changes that are not explicitly defined to be within the scope of CMP.

Impact:

Qwest did not adhere to its established change management process for notifying CLECs about proposed changes, and allowing input from all interested parties. In this instance, Qwest's failure to conduct thorough research prior to CR initiation necessitated follow-up investigations that increased the length of legal, regulatory, and operational discussions, thereby reducing the time allowed for CLECs to prepare for proposed changes. Any changes that are implemented without close examination by all interested parties may override Qwest's prior agreed upon service obligations to CLECs.

Qwest Formal Response (12/21/01):

This Exception is premised on KPMG's statement that "Qwest did not adhere to its established change management process for notifying CLECs about proposed changes" in processing the CR at issue. KPMG appears to assume that the process that applies to this CR is the *Interim Qwest Initiated Product/Process Change Request Initiation Process* that was developed in the CMP Redesign Sessions. CLECs have now clearly stated, however, that they never intended for that interim process to apply to the Qwest-initiated change at issue here.

At the time Qwest issued this CR, Qwest believed that this interim process might apply to the testing process clarification and, therefore, in good faith, submitted a CR. However, there was confusion between Qwest and the CLECs regarding the applicability of that interim process. The CLECs subsequently clarified at the December 10-11, 2001 redesign session that they never intended for that interim process to only apply to anything except changes that arose from 271 workshops or OSS testing. The interim process, as clarified by the CLECs and agreed to by Qwest, currently calls for Qwest to initiate CRs *only* for changes that alter CLEC operating procedures (as determined by Qwest), and that are made as a result of third party test or a 271 Workshop. Therefore, under the established change management process, Qwest was not required to submit or process a CR for this issue in the first place. Nonetheless, even though submission of the CR turned out not to be necessary, Qwest submitted a CR in good faith and followed the interim process.

Qwest's responses to each of the five bullet points KPMG raises are set forth below.

KPMG Issue: *Qwest, through the CMP, did not provide adequate information to CLECs about a significant CLEC-impacting process change;*

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Qwest Response:

Qwest provided information and answered CLEC questions regarding this CR by introducing CR No. PC100101-5 to the CLEC community through the Change Management Process (CMP). As noted above, at the time Qwest submitted this CR, it did so based on a good faith effort to comply with the *Interim Qwest Initiated Product/Process Change Request Initiation Process*. Since that time, the CLECs have clarified that they want that process to only apply to certain changes arising from 271 workshops or OSS testing. All other Qwest initiated product/process changes will be discussed at future Redesign sessions. At those future sessions, the nature and amount of information that Qwest must provide regarding its product/process CRs will be defined. Thus, Qwest provided more information than was required under existing processes by submitting the CR to the CLECs.

Qwest's efforts to provide information did not stop with submitting the CR. Qwest held at least three meetings with CLECs to provide information and answer CLEC questions relating to the CR. See Chronology of Events below.

KPMG Issue: *Once Qwest had answered some of the important regulatory, product, and documentation questions, Qwest allowed only four (4) business days for CLECs to prepare for the proposed change⁴;*

Qwest response:

The process for additional testing described in the CR, which was introduced on October 17, 2001, did not change from that time until the time it was fully implemented on December 1, 2001. Thus, the CLECs had more than 6 weeks -- not only 4 days -- to prepare for the change. The chronology below outlines the key notification dates relating to this CR.

Chronology of Events for CR No. PC 100101-5

- 10/17/01 - CMP Meeting: Qwest introduced "Description of Change" and agreed to provide detailed package for CLEC review. Walk through meeting to be scheduled by Qwest in the late October/early November 2001 time frame.
- 10/26/01 - Notification forwarded to the CLEC community regarding presentation of CR in the October 31, 2001 CMP Re-Design Meeting.

⁴ At the time of this report, KPMG Consulting observed that Qwest and CLECs had not agreed on all legal and regulatory aspects of this CR.

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- 10/31/01 - CR presented to the participating CLECs at the CMP Re-Design Meeting. CLECs were requested to provide comments. **Qwest agreed to delay initial implementation date to address CLEC concerns.**
- 11/08/01 - Qwest Notification (Document No. PROD.11.08.R.00197.Mtce&Repair Language; Subject: Update to Product Information on Maintenance and Repair Language within EEL, UDIT, LMC and Unbundled Loop General) transmitted to CLEC community.
- 11/08/01 - PCAT Documents posted to the Qwest Wholesale CMP Document Review website: <http://www.qwest.com/wholesale/cmp/review.html>. Comments from CLEC community due in 15 calendar days (11/23/01), as stated in "Interim External Change Management Process for Qwest Initiated Product/Process Changes," Version 6 – 11/26/01.
- 11/13/01 - Notification transmitted to CLEC community regarding follow-up meeting scheduled for 11/26/01.
- 11/14/01 - CMP Meeting - Qwest advised CLEC community that PCAT documents currently are available for comment.
- 11/24/01 - No comments were received from the CLEC community regarding PCAT documents posted to the Qwest Wholesale CMP Document Review Website.
- 11/26/01 - Qwest conducted a follow-up meeting with the CLEC community to discuss any technical issues with the CR (primarily operational and testing issues). Responses to questions were prepared for posting on the Qwest Wholesale WEB page.
- 11/28/01 - "Questions & Answers for Additional Testing 11/26/01" document posted to Qwest Wholesale website
<http://www.qwest.com/wholesale/cmp/changerequest.html>
- 11/28/01 - "Additional Testing Process Document - 11/09/01" and "Additional Testing Process Presentation - 11/09/01" posted to Qwest Wholesale website: <http://www.qwest.com/wholesale/cmp/changerequest.html> These documents were previously posted in the Qwest Wholesale CMP Re-Design website: <http://www.qwest.com/wholesale/cmp/redesign.html>
- 11/30/01 - Qwest IT Wholesale Communicator, November 30, 2001, Document No. SYST.11.30.01.F.02444_CEMR_UG_Update, CEMR User's Guide Update transmitted to Qwest Wholesale Customers

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- 12/05/01 - Formal Escalation received from Eschelon regarding implementation of CR.
- 12/06/01 - Qwest response sent acknowledging receipt of Formal Escalation from Eschelon (PC100101-5-E01).
- 12/07/01 - KMC Telecom notified Qwest to participate in the formal escalation initiated by Eschelon.

KPMG Issue: *Qwest, through the CMP, did not respond to input from all interested parties; a number of CLECs objected to Qwest's implementation of this change and requested its immediate suspension.*

Qwest response:

Qwest acted on CLEC input by holding additional meetings and agreeing to delay the original implementation date. Further, the processes that Qwest and the CLECs agreed to use for resolving disagreements are the escalation and dispute resolution processes. CLECs have invoked the escalation process with regard to this CR. In accordance with that process, Qwest responded to the escalation and offered a proposed process for resolving the CLEC concerns. Qwest will continue to abide by the agreed processes for resolving the disagreements relating to this CR and hopes to reach a mutually agreeable solution to the issues.

KPMG Issue: *Qwest, through the CMP, did not update CR status on a timely basis;*

Qwest response:

The CMP database is posted to the website on an "every third day" basis with updated CR status, status history, responses, meeting minutes, etc. for all active CRs. Qwest therefore does not understand KPMG's statement and needs additional detail regarding the specific issue if KPMG needs a more specific response.

KPMG Issue: *Qwest CR includes rate changes that are not explicitly defined to be within the scope of CMP.*

Qwest response:

The Qwest-initiated CR at issue here does not include rate changes. The purpose of the CR is to clarify that, if a CLEC chooses not to perform diagnostic testing to determine whether trouble resides within the CLEC's network, the CLEC may request that Qwest perform that testing on the CLEC's behalf. Under the process, a CLEC that asks Qwest to test on the CLEC's behalf also authorizes Qwest to charge the CLEC for performing that testing. Qwest proposed to use existing labor rates -- in CLEC interconnection

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agreements or the SGAT -- for performing the testing. Qwest also offered to enter into an amendment to interconnection agreements to specify the rate if a CLEC preferred to address the issue that way.

KPMG Consulting's First Response (01/07/02):

KPMG Consulting reviewed Qwest's response and found that the information presented differs in several ways from KPMG Consulting's understanding of the Interim Product/Process CMP. Qwest stated, in October 2001, that it would submit CRs for changes to products or processes that alter CLEC operating procedures, and that the Interim Product/Process CMP would govern all Qwest-initiated Product/Process CRs.⁵ KPMG Consulting attended the October 17, 2001 Product/Process CMP Meeting, and observed that Qwest planned to implement PC100101-5 sooner than the 45-day interval that the interim process specifies. CLECs expressly stated that this change would be CLEC-impacting.⁶

KPMG Consulting observed that, on October 31, 2001, Qwest agreed to take the following action items:

- | | |
|-----------------------|---|
| Regulatory: | Qwest would investigate whether or not the proposed CR would comply with Qwest's legal obligations, such as SGATs and Interconnection Agreements; |
| Products: | Qwest would specify the products affected by the proposed CR; |
| Documentation: | Qwest would provide CLECs with the revised PCAT language. |

At the October 31, 2001 meeting, Qwest agreed to change the implementation date from November 19, 2001 to December 1, 2001. This change was made because Qwest planned to address important questions related to the above three topic areas at the follow-up meeting scheduled for November 26, 2001.

In response to CLEC objections, Qwest's legal and change management staffs stated, on November 29, 2001, that Qwest would investigate whether or not the implementation of this change would be suspended. As of December 1, 2001, however, Qwest had not provided CLECs with any status update regarding this CR. Based on information on the Qwest CMP Web site, it was unclear if CR PC100101-5 was going to be suspended, delayed a second time, or implemented on December 1, 2001. In response to a CLEC inquiry regarding the issue, Qwest formally informed CLECs, on December 4, 2001, that CR PC100101-5 had been executed on December 1, 2001, and advised the inquiring

⁵ *Qwest Corporation's Report on the Status of Change Management Process Redesign before the Public Utilities Commission of the State of Colorado* dated October 10, 2001.

⁶ The draft meeting minutes of the October 17, 2001 Product/Process CMP meeting were included in the November 2001 Product/Process CMP distribution package located at <http://www.qwest.com/wholesale/downloads/2001/011112/ProductProcessNovDistPackage2.pdf>.

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CLEC, through an email response, that interested parties should escalate the issue through the formal Change Management escalation procedure.

Based on the above events, KPMG Consulting provides a review each of the major issues included in this Exception:

1. *Following its responses to important regulatory, product, and documentation questions, Qwest allowed only four (4) business days for CLECs to prepare for the proposed change.*

Appendix A shows that the original CR form lacked specific information about the proposed change. As of October 31, 2001, Qwest had not provided CLECs with details or answers that addressed important regulatory, products, and documentation questions. In addition, KPMG Consulting observed that Qwest had not provided CLECs with draft PCAT documentation until November 8, 2001. In the absence of the above information and/or documentation, CLECs were unable to adequately prepare for the proposed change in advance of its implementation. Qwest's failure to conduct thorough research prior to initiating the CR necessitated follow-up investigations that increased the length of legal, regulatory, and operational discussions, thereby reducing the time allowed for CLECs to prepare for the proposed change. Based on the above observation, KPMG Consulting respectfully disagrees with Qwest's statement that CLECs had "more than six weeks" to make informed decisions and adapt to the proposed change.

2. *Qwest, through the CMP, did not provide adequate information to CLECs about a significant CLEC-impacting process change.*

KPMG Consulting observed that Qwest did not provide CLECs with adequate information in advance of the CR implementation. As shown in Appendix A, the original CR form, which CLECs expressly stated on October 17, 2001 would impact their business operations, lacked specific information about the proposed change. As of October 31, 2001, Qwest had not provided CLECs with details or answers that addressed important regulatory, product, and documentation questions. In addition, KPMG Consulting observed that Qwest had not provided CLECs with draft PCAT documentation until November 8, 2001, and a follow-up meeting did not take place until November 26, 2001, four days before the CR's actual implementation. Qwest's failure to provide information necessitated follow-up investigations that increased the length of legal, regulatory, and operational discussions, thereby not affording CLECs adequate time to prepare for the proposed change.

3. *Qwest, through the CMP, did not respond to input from all interested parties; a number of CLECs objected to Qwest's implementation of this change and requested its immediate suspension.*

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KPMG Consulting understands that CLECs have invoked the Escalation Process with regard to the CR in question. Nonetheless, since Qwest did submit a CR through the CMP, the fact that Qwest implemented the change – in spite of CLEC objections – indicates that, within the overall CMP framework, there is a lack of clarity between what Qwest defines as a CR, and a Qwest unilateral notification of process change. In addition, Qwest was unable to answer all CLEC inquiries at the additional meetings held to discuss this CR in more detail. At the November 29, 2001 meeting, it was still uncertain whether or not the change would be implemented on December 1, 2001.

4. *Qwest, through the CMP, did not update CR status on a timely basis.*

Qwest distributed SYST.11.30.01.F.02444_CEMR_UG_Update at 10:39 AM MST on **December 3, 2001** (see Appendix B). On November 29, 2001, Qwest legal and change management staff indicated that Qwest would investigate whether or not the CR would be suspended, but did not provide CLECs with the status update until December 4, 2001, three days after the change had gone into effect. As of December 1, 2001, the CR status report on the Qwest CMP Web site did not indicate if CR PC100101-5 was suspended or implemented.

5. *Qwest CR includes rate changes that are not explicitly defined as within the scope of CMP.*

Qwest's response to this issue stated that the CR, itself, did not result in rate changes. However, the change in question is Qwest's implementation of a new testing process for Maintenance & Repair that results in Qwest's unilateral imposition of labor rates without CLEC agreement. The change potentially does have a significant financial impact on some CLECs. KPMG Consulting is aware that rate changes are not explicitly defined as within the scope of CMP, but would expect all Qwest-initiated CRs to follow the defined CMP Process.

KPMG Consulting did not observe Qwest's offer⁷ to enter into an amendment to interconnection agreements. KPMG Consulting reviewed the *Questions & Answers for Additional Testing 11/26/2001* document⁸, and was unable to locate information to support Qwest's statement. Instead, KPMG Consulting observed that Qwest repeatedly stated in meetings that the CR was a clarification of existing requirements, thus making an amendment unnecessary. For instance, at the October 31, 2001 meeting, one CLEC asked if Qwest had checked all existing interconnection agreements to ensure that the CR was consistent with Qwest's

⁷ Qwest quote from December 21st response: "Qwest also offered to enter into an amendment to interconnection agreements to specify the rate if a CLEC preferred to address the issue that way."

⁸ The *Questions & Answers for Additional Testing 11/26/2001* document is located at http://www.qwest.com/wholesale/downloads/2001/011128/QA_CR_PC100101-5OptTesting112601.doc.

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legal obligations. Qwest replied, “yes,” suggesting that no amendment was necessary.

KPMG Consulting recommends that this Exception remain open pending resolution of the above issues.

Qwest Response to KPMG Comments (01/25/02):

This Exception needs to be viewed in the unique context of the interim process for product and process changes in the Change Management Redesign process. During the redesign sessions, there was a misunderstanding regarding the scope of an interim process and the status of the CMP Redesign Team's discussions regarding that process. The redesign misunderstanding uniquely impacted the Additional Testing CR. As a result of that misunderstanding, the Additional Testing CR was initiated pursuant to the interim process established by the redesign team. Because of objections raised by CLECs in the redesign sessions, the Additional Testing CR was then handled pursuant to the process that existed before the redesign sessions began. As a result of the unique situation caused by the redesign misunderstanding, the issues raised in this Exception do not reflect the kind of systemic departure from procedure that is appropriately raised in an Exception. Further, the issues raised in this Exception appear to be confused by the inclusion of CLEC advocacy positions and/or requests in the factual recitation. The relevant facts are set forth below.

- Qwest initiated this CR under the *Interim Qwest Product/Process Change Management Process*.

As Qwest stated in its initial response, at the time Qwest issued this CR, Qwest believed that the *Interim Qwest Initiated Product/Process Change Request Initiation Process* that was developed in the CMP Redesign Sessions might apply to the testing process clarification and, therefore, it submitted the CR. Since that time, it became apparent that the CLECs and Qwest had different understandings regarding the scope of the interim process. The CLECs and Qwest have spent a great deal of time in CMP Redesign Sessions discussing their respective positions regarding the interim process. During these sessions it became clear that the CLECs intended that the interim process should only apply to changes that were generated by the 271 workshops or OSS testing. Qwest agreed to this limitation on the scope of the interim process.

These discussions are reflected in the meeting minutes for the CMP Redesign Sessions held October 30 through November 1, 2001 (see pp. 2-3); November 13, 2001 (see p. 5); and November 27 through November 29, 2001 (see pp. 13-15). Copies of the discussion summaries from these minutes have been provided with this response or they may be located at the following URL under subheading Meeting Minutes, <http://qwest.com/wholesale/cmp/redesign.html>

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- Qwest processed this CR in accordance with the interim process until it became clear that the interim process did not apply.

The interim process requires that Qwest post its CR and related documentation to the CMP web site, and discuss it at the CMP Monthly Forum. The CLECs may raise any questions during the discussions and submit written comment through a mechanism on the web site. Any issues that are not resolved can be escalated.

Qwest followed the interim process by issuing the CR, discussing it at the CMP Monthly Forum, and posting the documentation changes on the CMP web site. Qwest also held meetings with the CLECs in addition to the CMP Monthly Forum in which Qwest answered CLEC questions relating to the CR. Qwest received no written comments through the web site mechanism. Qwest responded orally and in writing to the issues the CLECs raised in the several meeting that were held. These actions satisfied the interim process.

For ease of reference, a copy of the Interim Qwest Product-Process CMP document has been provided with this response or can be located at the following URL under Redesign Documentation, <http://qwest.com/wholesale/cmp/redesign.html>

- Qwest has also complied with the existing change management process.

By December 12, 2001, when this Exception was written, it was clear that the interim process did not apply. Thus, Qwest was not required to issue or process any CR in accordance with that process. Because the CMP Redesign team has not agreed to any other product/process procedures, the process that applies is the existing change management process. Under the existing process, Qwest must only provide notice before implementing a change (the existing process document titled Current CICMP has been provided with this response.) Qwest has gone far beyond that simple requirement by issuing the CR, holding several meetings to discuss the CR and answer CLEC questions, and issuing the documentation for comment.

- The remaining issues raised in this Exception do not change the analysis set forth above.

There are other issues raised in this Exception, such as KPMG's statement that there was confusion in the November 29, 2001 CMP Redesign Session regarding whether the CR would be implemented on December 1. The minutes for that meeting do not reflect any such confusion. Moreover, Qwest clearly stated at the end of the conference call held with the CLECs on November 26, 2001 to discuss the CR that it would implement the CR on December 1. There was no reasonable basis for any such confusion.

KPMG also points to a CLEC request for suspension of the CR. It is important to note that neither process required Qwest to delay or cancel implementation simply because a CLEC disagreed with or raised questions regarding Qwest's proposed change.

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Furthermore, Qwest has reviewed the change management processes of other companies, and no other process in the country, including processes reviewed by KPMG in other tests, includes a requirement that the ILEC suspend a proposed change if a CLEC objects to the change. Instead, any such issue upon which agreement could not be reached is required to be treated in the same way under the existing change management process and the interim product/process change management process: they are to be escalated. That is, in fact, what happened with this CR -- Eschelon and other CLECs initiated an escalation. This was the appropriate method for resolving any unresolved issues under both processes.

Attachments:

- ROC_TI764_EXP3094_Qwest INTERIM QWEST RODUCT-PROCESS_CMP-Revised_10-3-01_01_25_02.doc
- ROC_TI764_EXP3094_CMP Redesign Meeting Minutes Nov 27-29_01_25_02.doc
- ROC_TI764_EXP3094_CMP Redesign Meeting Nov 13 Final Minutes_01_25_02.doc
- ROC_TI764_EXP3094_CMP Redesign Meeting Oct 30-31 - Nov 1 Final Minutes_01_25_02.doc
- ROC_TI764_EXP3094_Current CICMP Doc Last Revised 05-11-01_01_25_02.doc

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KPMG Consulting's Second Response (02/12/02):

KPMG Consulting has reviewed Qwest's January 25, 2002 response along with the following referenced documents:

- (a) *Final CMP Redesign Meeting Minutes 10/30/2001 – 11/1/2001;*
- (b) *Final CMP Redesign Meeting Minutes 11/13/2001;*
- (c) *Final CMP Redesign Meeting Minutes 11/27/2001 – 11/29/2001;* and
- (d) *Interim Qwest Product/Process Change Management Process* dated 10/3/2001.

In addition, KPMG Consulting reviewed other meeting minutes and materials relevant to this Exception and available at the Qwest CMP Web site⁹:

- (e) *Draft Meeting Minutes for Product/Process CMP Monthly Meeting 10/17/2001;*
- (f) *Draft Meeting Minutes for Product/Process CMP Monthly Meeting 11/14/2001;*
- (g) *Change Management Process (CMP) Improvements – 11-26-01;*
- (h) *Final CMP Redesign Meeting Minutes 12/10/2001 – 12/11/2001;* and
- (i) *Draft Meeting Minutes for Product/Process CMP Monthly Meeting 12/12/2001.*

KPMG Consulting agrees with Qwest that the subject of this Exception needs to be considered in relation to the applicability of the interim process for product and process changes as part of the Change Management Redesign Process. Qwest has indicated, in its previous responses, that it believes that a Qwest CR was not necessary for this process change based on the scope and requirements of the Interim Product/Process CMP. Based upon discussions that were held November 27 – 29, 2001 and again on December 10 – 12, 2001, Qwest believed that the interim process applied only to changes related to Third Party Testing and to 271 workshops.

KPMG Consulting issued this Exception following an extensive review of facts and circumstances. In particular, KPMG Consulting published this Exception after December 1, 2001, the Qwest-scheduled implementation date for this process change, in order to observe the complete set of circumstances, processes, and activities related to CR PC100101-5. The Exception identifies a deficiency in the Change Management Process that will result in a negative comment for one or more of the evaluation criteria in the Final Report if left unresolved.

The specific process issues that KPMG Consulting has identified in this Exception include:

1. Qwest, through the CMP, did not provide adequate information to CLECs about a significant CLEC-impacting process change;

⁹ CMP Redesign documents are posted at: <http://www.qwest.com/wholesale/cmp/redesign.html>

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2. Once Qwest had answered some of the important regulatory, product, and documentation questions, Qwest allowed only four business days for CLECs to prepare for the proposed change¹⁰;
3. Qwest, through the CMP, did not respond to input from all interested parties; a number of CLECs objected to Qwest's implementation of this change and requested its immediate suspension;
4. Qwest, through the CMP, did not update the CR's status on a timely basis;
5. Qwest's CR includes rate changes that are not explicitly defined to be within the scope of CMP.

KPMG Consulting provided a detailed review of each of these discussion items in the first response to this Exception on January 7, 2002. In its January 25, 2002 response, Qwest raised additional concerns surrounding the unique situation for the Additional Testing CR and for Change Management Redesign. KPMG Consulting offers additional comments to clarify the facts and background regarding the issuance of this Exception.

- **Qwest initiated the CR under the *Interim Qwest Product/Process Change Management Process*.**

Qwest implemented the Interim Product/Process CMP on October 17, 2001, the same day that Qwest first presented CR PC100101-5 for discussion with CLECs. According to the minutes from this meeting, Qwest stated that it had intended to issue a notification instead of a CR in order to implement the proposed change in 15 days instead of 45 days. Qwest had brought the issue forward as a CR in good faith for CLECs to have adequate advance review. Several CLECs stated that the proposed change would be CLEC-impacting, and requested Qwest to provide CLECs with complete information about the proposed change before counting days as part of the defined 45 day interval for notifying CLECs, for soliciting CLEC input, and for finalizing the change. Qwest later reaffirmed that the interim process for Qwest-initiated CRs was meant for all Qwest product/process changes that altered CLEC operating procedures¹¹.

- **As of December 12, 2001, it was still unclear that the interim process did not apply. KPMG Consulting's understanding is that the interim process was in effect during the period in question (i.e., October 17, 2001 through December 12, 2001).**

Although Qwest stated on October 31, 2001 that it would delay implementation of the CR in question on December 1, 2001 to address CLEC concerns, Qwest had not resolved all of the regulatory, product, and documentation questions and scheduled another follow-up meeting for November 26, 2001. Meeting minutes indicate that the discussion about the disagreement over the interim process had not begun until November 27, 2001, after Qwest had already scheduled implementation of CR PC100101-5. In this case,

¹⁰ At the time of this report, KPMG Consulting observed that Qwest and CLECs had not agreed on all legal and regulatory aspects of this CR.

¹¹ See Final Meeting Minutes, CMP Process Re-design, October 30 – November 1, 2001.

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Qwest scheduled the change implementation date prior to making complete information available to CLECs and receiving their comments.

Based on a review of the minutes from the three Change Management Redesign sessions held prior to the CR's implementation, KPMG Consulting believes that CLECs and Qwest did not reach consensus about the degree of decision-making authority CLECs would have in modifying or suspending Qwest-initiated CRs¹². In fact, it was in response to the objections with this CR and the degree of input into the process that the CLECs considered limiting the scope of the interim process in December.

KPMG Consulting does not consider meeting minutes which provide written record of opinions and open discussion about the Change Management development to serve as a proxy for the formalized process that was in place at the time that this change occurred. Furthermore, there does not appear to be conclusive language in the minutes to suggest that the Interim process did not apply as of December 1, 2001.

Qwest issued two documents that suggest the approach for Qwest-initiated process CRs had not changed. One document lists all CMP improvements that were effective or scheduled to be implemented as of November 26, 2001¹³. The Qwest-initiated Product and Process CR Process is cited as being implemented October – November, 2001. The other document describes the process by which baseline elements of the redesign effort may occur prior to the completion of the CMP redesign effort¹⁴. The document states that implementing baseline changes requires agreement among Core Team members and an implementation presentation for the general CLEC community.

KPMG Consulting considers Change Management to be an essential element of ongoing CLEC business operations and of the Qwest-CLEC business relationship. Because it governs an important part of all CLEC interaction with Qwest, KPMG Consulting would expect, at a minimum, that Qwest CMP would feature the following functions:

- Qwest notifies CLECs of all CLEC-impacting changes with complete information and sufficiently in advance of such changes;
- CMP includes the procedures through which Qwest takes into consideration the feedback from CLECs on all proposed CLEC-impacting changes; and
- CLECs have the opportunity to modify, discuss, and escalate issues encountered with proposed changes.

In response to this Exception, Qwest stated that it was not aware of CLEC objections to CR 100101-5 because Qwest did not receive any written comments through the Web-based PCAT documentation review mechanism. However, the Redesign meeting

¹² Quote from *Final CMP Redesign Meeting Minutes 11/13/2001*: "Schultz cited that there did not appear to be agreement between the CLEC community concerning the Qwest initiated product/process CR process."

¹³ See Appendix B: *Process to Deploy Qwest CMP Improvements – 11-26-01*.

¹⁴ See Appendix C: *Change Management Process (CMP) Improvements – 11-26-01*.

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minutes clearly demonstrate that CLECs were dissatisfied with both the change in question and with the overall process for managing Qwest-initiated CRs. Qwest Change Management representatives, who act as Qwest's point of contact, were present at these meetings. After having heard CLEC objections, none of the Qwest representatives had advised CLECs to escalate the CR in question until December 4, 2001¹⁵, three days after implementation, thus leaving CLECs wondering if Qwest was going to respond to CLECs by suspending the proposed change.

Due to differences in scope and history among ILEC change management processes, KPMG Consulting considers it inappropriate to compare Qwest CMP to that of other ILECs. As part of 271 OSS Testing effort, KPMG Consulting is evaluating Qwest CMP based on a pre-determined framework of evaluation criteria. Based on Qwest's latest response and the current state of Product/Process CMP, at least one KPMG Consulting evaluation criteria for Test 23 would be assessed "Not Satisfied." KPMG Consulting points to the CLEC request for suspension of the CR as an example of the collaborative extent of CMP and the ineffectiveness of the process to address disputes such as this. The Exception is not based on a requirement that an ILEC suspend a proposed change if the CLEC objects to the change.

KPMG Consulting considers the fact that Qwest implemented CR PC100101-5 without taking into consideration CLEC objections, its failure to make available complete information sufficiently in advance of the scheduled change, as well as the subsequent impasse¹⁶ about the process governing Qwest-initiated changes as indicative of lack of a defined and documented change management process.

KPMG Consulting reviewed aforementioned documents and identified that Qwest did not adhere to the expectations of a well-formed, functioning Qwest-CLEC change management process.

KPMG Consulting recommends that this Exception remain open pending implementation of and observation of adherence to a complete process for Qwest-initiated Product and Process Change Requests.

¹⁵ In response to CLEC inquiry to Judy Schultz and Laura Ford, Qwest advised Eschelon to escalate the CR in question in an email dated December 4, 2001, at 7:13 PM.

¹⁶ KPMG Consulting observed that Qwest and CLECs were at impasse about Qwest-initiated Product/Process changes from December 2001 to February 2002.

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APPENDIX A

Co-Provider Change Request Form

Log # PCCR100101 Status: Submitted

-5

Submitted By: Debra Smith

Date 10/01/01

Submitted: _____

Co-

Provider:

Internal Ref# _____

Submitter: Debra Smith, Qwest Unbundled Loop Product Manager, dssmith@qwest.com,
515-241-1206

Name, Title, and email/fax#/phone#

Proprietary for submission to Account Manager Only? Please check mark 4 as appropriate

☐ Yes ☐ No

Title of Change:

Clarification of Additional Testing Process

Area of Change Request: Please check mark 4 as appropriate and fill out the appropriate section below

☐ System ☐ Product ☒ Process

System Change Request Section

Interfaces Impacted: Please check mark 4 as appropriate

☐ CEMR

☐ IMA EDI

☐ MEDIACC

☐ TELIS

☐ EXACT

☐ IMA GUI

☐ Product Database

☐ Wholesale Billing

☐ HEET

☐ Directory Listings

☐ Other

Interfaces

Please
describe

Description of Change:

Is new information requested in a specific screen or transaction?

☐ Yes ☐ No

If yes, name the screen or
transaction: _____

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Products Impacted: Please check mark 4 as appropriate and also list specific products within product group, if applicable

<input type="checkbox"/> Centrex	_____	<input type="checkbox"/> Resale	_____
<input type="checkbox"/> Collocation	_____	<input type="checkbox"/> SS7	_____
<input type="checkbox"/> EEL (UNE-C)	_____	<input type="checkbox"/> Switched Services	_____
<input type="checkbox"/> Enterprise Data Services	_____	<input type="checkbox"/> UDIT	_____
<input type="checkbox"/> LIDB	_____	<input type="checkbox"/> Unbundled Loop	_____
<input type="checkbox"/> LIS	_____	<input type="checkbox"/> UNE-P	_____
<input type="checkbox"/> LNP	_____	<input type="checkbox"/> Wireless	_____
<input type="checkbox"/> Private Line	_____	<input type="checkbox"/> Other	_____
	Please describe		Please describe

Known Dependencies:

Additional Information: (e.g., attachments for business specifications and/or requirements documents)

Co-Provider Priority Level

☐ High ☐ Medium ☐ Low

Desired Implementation ASAP- High

Date: _____

Product Change Request Section

Products Impacted: Please check mark 4 all that apply (if "Other" please describe further)

<input type="checkbox"/> LIS/Interconnection	<input type="checkbox"/> Collocation	<input type="checkbox"/> UNE	<input type="checkbox"/> Ancillary	<input type="checkbox"/> Resale
<input type="checkbox"/> EICT	<input type="checkbox"/> Physical	<input type="checkbox"/> Switching	<input type="checkbox"/> AIN	
<input type="checkbox"/> Tandem Trans./TST	<input type="checkbox"/> Virtual	<input type="checkbox"/> Transport (incl. EUDIT)	<input type="checkbox"/> DA	
<input type="checkbox"/> DTT/Dedicated Transport	<input type="checkbox"/> Adjacent	<input type="checkbox"/> Loop	<input type="checkbox"/> Operation Services	
<input type="checkbox"/> Tandem Switching	<input type="checkbox"/> ICDF Collo.	<input type="checkbox"/> UNE – P	<input type="checkbox"/> INP/LNP	
<input type="checkbox"/> Local Switching	<input type="checkbox"/> Other _____	<input type="checkbox"/> EEL (UNE-C)	<input type="checkbox"/> Other _____	
<input type="checkbox"/> Other _____		<input type="checkbox"/> UDF		

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☐

Other _____

Description of Change:

Known Dependencies:

Additional Information: (e.g., attachments for business specifications and/or requirements documents)

Co-Provider Priority Level

☐ High ☐ Medium ☐ Low

Desired Implementation

Date: _____

Process Change Request Section

Area Impacted: Please check mark 4 as appropriate

☐ Pre-Ordering

☐ Ordering

☐ Billing

☒ Repair

☐

Other _____

Please describe

Description of Change:

Currently, CLECs' are responsible for testing UNE's prior to submitting a trouble report to Qwest. CLECs' are to provide test diagnostics including specific evidence that the trouble is in the Qwest Network along with the associated Qwest circuit identification number. If the CLEC elects not to perform the necessary UNE testing, Qwest will offer to do such testing on CLECs' behalf. If such testing is requested by the CLEC, Qwest will perform the additional testing and bill the CLEC the appropriate charges that are in their Interconnection agreement.

If the CLEC does not provide test diagnostics and elects not to have Qwest perform additional testing on their behalf, Qwest will not accept a trouble report. Additional Charges may apply when the testing determines the trouble is beyond the Loop Demarcation Point

This additional testing option is available on the Unbundled Loop Product Suite, Unbundled Dedicated Transport (UDIT), Enhanced Extended Loop (EEL) and Loop Mux.

Products Impacted: Please check mark 4 as appropriate and also list specific products within product group, if applicable

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<input type="checkbox"/> Centrex	_____	<input type="checkbox"/> Resale	_____
<input type="checkbox"/> Collocation	_____	<input type="checkbox"/> SS7	_____
X EEL (UNE-C)	_____	<input type="checkbox"/> Switched Services	_____
<input type="checkbox"/> Enterprise Data Services	_____	X UDIT	_____
<input type="checkbox"/> LIDB	_____	X Unbundled Loop	_____
<input type="checkbox"/> LIS	_____	<input type="checkbox"/> UNE-P	_____
<input type="checkbox"/> LNP	_____	<input type="checkbox"/> Wireless	_____
<input type="checkbox"/> Private Line	_____	<input type="checkbox"/> Other	_____
	Please describe		Please describe

Known Dependencies:

Additional Information: (e.g., attachments for business specifications and/or requirements documents)

Co-Provider Priority Level

☐ High ☐ Medium ☐ Low

Desired Implementation

Date: _____

This Section to be Completed by Qwest CICMP Manager

Qwest Account Manager Notification

Account Manager: _____ Notified : _____

Qwest CICMP Manager Clarification Request

☐ Yes ☐ No

If yes, clarification request sent: _____ Clarification received: _____

Co-Provider Industry Team Clarification Request

☐ Yes ☐ No

If yes, clarification request sent: _____ Clarification received: _____

Status, Evaluation and Implementation Comments:

10/01/01 – CR received by Deb Smith of Qwest
10/01/01 – CR status changed to Submitted
10/01/01 – Updated CR sent to Deb Smith

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☐ Yes ☐ No

**Candidate for a
Release**

If yes, Release

Number: _____

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APPENDIX B

Process to Deploy Qwest CMP Improvements– 11-26-01

As Change Management Process redesign elements (major sections of the Master Redlined CMP Redesign framework) are discussed and baseline language is determined, Qwest and/or a CLEC-Core Team representative may propose to implement the baseline element. This request may occur prior to the completion of the CMP redesign effort. The CMP Redesign Core Team shall comply with the following process for implementing baseline changes:

- The Core Team reaches agreement to implement a given baseline element and determines the implementation date.
- Qwest develops an implementation presentation for the general CLEC community.
 - The Implementation Presentation shall include:
 - Language from the master redlined CMP framework
 - Other pertinent information, if applicable
 - Implementation/effective date
- At the next Monthly CMP meeting, Qwest and the Re-design Core Team will collectively present the proposed change. The Team shall seek comments, if any, from the general CLEC community.
- If there are no objections, Qwest shall implement the changes in accordance with the implementation plan.
- If there are objections, the Re-design Core Team will consider the input, and determine the appropriate course of action.

At the conclusion of the Re-design effort, the Core Team will present the Final Master Red-Line document to the general CLEC community for review and acceptance.

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APPENDIX C

Change Management Process (CMP) Improvements – 11-26-01

Improvement	Implementation Date(s)
Standard Naming Convention	August 2001
Web Site Improvements <ul style="list-style-type: none">- Design- Search Capabilities	October 2001
CMP Process Improvements <ul style="list-style-type: none">- CR Clarification Meetings- Meeting Distribution Package- Meeting Minutes- CR Tracking and Reporting Database- CR Project Management	August – November 2001
Escalation and Dispute Resolution Process <ul style="list-style-type: none">- Process- Web Site	November 2001
Exception Process	September 2001
OSS Interface 12 Month Development View	November 2001
CLEC/Qwest Initiated OSS Interface CR Process <ul style="list-style-type: none">- Process- Form	October – November 2001
CLEC/Qwest Initiated Product and Process CR Process <ul style="list-style-type: none">- Process- Form	October – November 2001
PCAT Red-Line	November 2001
Tech-Pub Red-Line	October 2001
Point of Contact List	October 2001
Established CMP Full Day Meetings	October 2001
Prioritization of Qwest Originated OSS Interface CRs	August – November 2001
Introduction of New OSS Interface	Ready when applicable
Web Tool to Support CLEC Comments on CRs	November 2001
Retirement of OSS Interface	Ready when applicable
Changes to an Existing OSS Application to Application Interface <ul style="list-style-type: none">- Draft Technical Specifications Walkthrough- CLEC Comment Cycle- Final Technical Specifications- CLEC Testing	Effective with IMA 10.0 Release
Changes to an Existing GUI <ul style="list-style-type: none">- Draft User Guide- CLEC Comment Cycle- Final User Guide	Effective with IMA 10.0 Release

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OSS IMA EDI Versioning	In Effect
Interface Testing Environment - SATE	In Place